

# BPA Public Involvement

From: Larry Cooke [larry.cooke@wa.usda.gov]  
Sent: Thursday, August 12, 1999 2:07 PM  
To: comments@bpa.gov  
Subject: deis transmission vegetation

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: TSVMD01-001
RECEIPT DATE: AUG 16 1999

## Comments:

figure V-2 Vegetation Type, you are showing light green (Majority deciduous) in many places in Eastern Washington and North Idaho. Most are wrong. The major river bottoms are deciduous and the uplands are coniferous. page 118 table V-1 shows white fir in mid elevations of the Blues and North Idaho. This is wrong. White fir occurs in southwestern Oregon. page 119, T&E species are listed by both USFWS and NMFS. page 161, the buffer widths for NRCS code 391A are national standards used in a general scope. Most States have supplemented this standard to fit their conditions and situations. There can be many widths depending on the circumstances. You should contact each State to obtain the State supplement to the National Standard. page 275, definition of T&E: Add NMFS after USFWS. page 235, Benewah County should receive a copy.

Larry Cooke, Environmental Specialist  
316 W. Boone, Suite 450  
Spokane, WA 99201  
(509) 323-2954  
larry.cooke@wa.usda.gov

## Transmission System Vegetation Management

"I'd Like to Tell You . . ."

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: TSVMD01-003
RECEIPT DATE: AUG 16 1999

- Of the choices offered in the Draft EIS, I prefer: R4; VS3; MA2  
BPA needs to keep all possible methods of  
"management" available to maintain safe and efficient  
power production and transmission.
- I do not like: The Policy that "No action" would be considered  
A management action
- You can improve the choices by: Eliminating all but R4, VS3, MA2
- I have these other comments: Do not weaken your position or  
stance by accepting any choice but R4, VS3, MA2
- I need more information about: Nothing

(Use back of sheet if you need more room)

☒ Please put me on your project mailing list. (You are already on the mail list if you received this in the mail.)

Name: Matt Vach, Supervising Forester, Umatilla County, Madras, OR  
Address: 3920 Westgate, Pendleton, OR 97801

Please mail your comments by October 9, 1999 to



Umatilla County  
Road Department  
3920 Westgate • Pendleton, Oregon 97801 • 97211

Bonneville Power Administration  
Communications Office - KC-7  
P.O. Box 12999



## BPA Public Involvement

From: hebrooks@bpa.gov  
 Sent: Tuesday, August 31, 1999 1:05 PM  
 To: comment@bpa.gov  
 Subject: Bonneville Power Draft EIS for transmission

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG# <u>TVM-005</u> RECEIPT DATE: <u>SEP 1 1999</u>
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I have reviewed the August, 1999 draft. There seems to be adequate unit costs for the various process that tend to lead toward the more cost effective and easier to administer processes. However I feel efficiency which I define as cost divided by time should be the economic evaluation basis. Therefore I suggest the economic evaluation be based on cost per unit per year instead of just cost per unit.

Also, one should look at the cost to maintain the entire system per year instead of cost per unit. Although this may seem to be similar to cost per unit per year, there are differences.

You may wish to consider cycle length and type of cycle in your evaluation. Frequently vegetation on an entire rights of way does not develop at the same rate. However, a utility frequently treats everything as the slower growing vegetation will not wait until the next cycle. We utilize a "just in time" cycle. In this cycle, a vegetative cover type or tree is not worked until actually needed. THIS REDUCES THE COST PER YEAR TO MAINTAIN THE ENTIRE SYSTEM. Cycles within cycles require more intense planning and are trickier to manage but can reduce the frequency of impact for many sites and save money. A just in time cycle also reduces the visual impact to a rights of way.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

## Transmission System Vegetation Management Program

## "I'd Like to Tell You . . ."

1. Of the choices offered in the Draft EIS, I prefer:

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG# <u>TVM-006</u> RECEIPT DATE: <u>SEP 1 1999</u>
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2. I do not like:

3. You can improve the choices by:

① The Draft EIS is lacking an analysis of the Threatened and Endangered Species. Particularly the effect of applying herbicides along stream banks where Salmon spawn in cool water and are protected by riparian vegetation.

4. I have these other comments:

② An analysis of the new (just now being drafted) Washington State Dept of Ecology's STORM WATER MANUAL (Vols. 1 through 5). How will that document fit in? Notice is attached.

5. I need more information about:

(Use back of sheet if you need more room)

☒ Please put me on your project mailing list. (You are already on the mail list if you received this in the mail.)
Name: LARRY PURCHASE (BPA) Ext. 3768

Address:

Please mail your comments by October 9, 1999 to:

Bonneville Power Administration  
 Communications Office - KC-7  
 P.O. Box 12999  
 Portland, OR 97211



## Transmission System Vegetation Management Program

## "I'd Like to Tell You ..."

1. Of the choices offered in the Draft EIS, I prefer: R4 - V51

RECEIVED BY BPA  
PUBLIC INVOLVEMENT  
LOG# TRM-002

RECEIPT DATE:  
09-10-99

2. I do not like: Language written under Alternative 4-5-1. Noxious Weeds (p. 5-15)  
that reads "The Commission would attempt to keep in compliance with controlling  
noxious weeds when the BPA is not currently in compliance with controlling  
noxious weeds (e.g. in the Montana NF) for noxious weeds currently designated  
by the State of Montana).

3. You can improve the choices by:

4. I have these other comments: Noxious weed management ought to have been presented  
as a purpose: page 5-15 given the impact (invasive and potential) that  
transmission system vegetation management has on plant communities and  
adjacent lands as regards noxious weeds. Perhaps explicit noxious weed  
management is implied in the third purpose: comply with laws and regulations? (D).

5. I need more information about:

(Use back of sheet if you need more room)

- ☐ Please put me on your project mailing list. (You are already on the mail list if you received this in the mail.)

Name: Murphy Lake Weed Crew (c/o Jack Triepke)  
Address: Murphy Lake R.S. P.O. Box 116 Fortin, MT 59918

Please mail your comments by October 9, 1999 to:  
Booneville Power Administration  
Communications Office - KC-7  
P.O. Box 12999  
Portland, OR 97212



## BPA Public Involvement

From: Rikki Osborn [rikki\_osborn@hotmail.com]  
Sent: Friday, September 10, 1999 10:08 AM  
To: comment@bpa.gov  
Subject: Transmission System Vegetation Management Program

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# <u>TRM-002</u>
RECEIPT DATE: <u>09-10-99</u>

1. Of the choices offered in the Draft EIS, I prefer any methods that give the biggest amount of tools in the tool box. This appears to be R4, V53, MA2, E1, and NE1. Anytime we can save money on high cost items - especially labor - and still reduce weeds and propagate a plant community of desirable vegetation that will reduce weeds and tall plants, I'm all in favor of it. I believe we can use herbicides to establish this desirable plant community then over time reduce the use of herbicides down to as necessary to combat invasive weeds that have no pathogens or parasites to keep them from spreading rapidly. If the above alternatives are not followed, I would think this would open up enforcement actions by both State and County Noxious Weed Authorities. This would result in fines and the work being done on large scale treatment and large amounts of herbicides which may or may not be on your approved list.

2. I do not like the use of "Environmentally Preferred Alternative". This reference is not in the best interests of long term vegetation management. Invasive weed species without their natural parasites or pathogens from their original homeland love to flourish in these areas. Uncontrolled rapid growth of exotic weeds is not in the best interests of the environment. A do nothing approach as suggested by anti herbicide groups is definitely anti environmental.

3. You can improve the choices by being scientific and not giving in to public action groups that claim to be "Environmental".

4. I would like to see consideration given to native vegetation to propagate your plant community, not just low growing grasses and forbs from where ever. I think consideration should be given to pressure washing all vehicles and equipment that enter your Right of Way especially from other weed infested sites. This should be done with the view of washing radiator and under carriages where seeds and plant fragments hide.

5. No Comment

Rikki Osborn  
Rt. 1 Box 116P  
Lenore, ID 83541

Get Your Private, Free Email at <http://www.hotmail.com>

## BPA Public Involvement

From: kim antieau [kantieau@hotmail.com]  
Sent: Tuesday, September 14, 1999 8:55 AM  
To: comment@bpa.gov  
Subject: transmission system vegetation management program

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG# TWM-019 RECEIPT DATE SEP 14 1999
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September 11, 1999

Dear BPA,

I was quite distressed upon reading your "transmission system vegetation management program." I am appalled that you are proposing (and probably already using) herbicides with a toxicity category II, III, and IV! These same herbicides are carcinogenic, teratogenic, mutagenic, and effect reproduction. (2,4-D is notorious for causing problems.) And you are actually proposing to use aerial spraying of some of these toxic chemicals?

As a government agency, you should be protecting us. Those of us who live in Skamania County are already bombarded by pesticides from the county, the state, Southwest Washington Health District, PUD, the railroad, gas lines, plus what private citizens spray. I am against any use of herbicides. Of course I understand the need to keep down vegetation but you have better, safer means. If you decide you must use herbicides (which I strongly protest), aerial and broadcast spraying should absolutely be banned from the program. You must consider the health of the entire ecosystem, of which we are a part. You are not the only ones using pesticides. Please keep that in mind.

Sincerely,

Kim Antieau

Get Your Private, Free Email at <http://www.hotmail.com>

## BPA Public Involvement

From: Kevin Hupp [khupp@co.lincoln.wa.us]  
Sent: Thursday, September 16, 1999 10:22 AM  
To: comment@bpa.gov  
Subject: DEIS COMMENTS

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG# TWM-019 RECEIPT DATE SEP 16 1999
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To Whom it May Concern:

I have read through the DEIS and have no problems with it.

I am glad to see your continued hard-line approach to controlling noxious weeds.

I am also pleased to see your proposal to use Bio-control and Herbicides for these noxious weeds.

I am most happy to see your continued supply of herbicides and biocontrol to landowners who have land where power lines travel through.

I would appreciate a look at the final proposal when completed or any other documentation that may come up regarding noxious weed control on BPA ground.

Sincerely,

KEVIN L. HUPP, COORDINATOR  
LINCOLN COUNTY NOXIOUS  
WEED CONTROL BOARD  
PO BOX 241  
DAVENPORT, WA. 99122  
(509) 725-3848  
<NOXIOUSWEEDS.COM>

## Kuehn, Virginia (Ginny) -KCC-7

From: Jay\_Neil@PacifiCorp.com  
Sent: Friday, September 17, 1999 7:21 AM  
To: Kuehn, Virginia (Ginny) -KCC-7  
Subject: External Generic (NOTA) information request

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: TVM-011 RECEIPT # SEP 1 1999
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NOTE: A copy of what the sender submitted on the form was e-mailed back to them.

Submitter: Jay Neil

Their e-mail address: Jay\_Neil@PacifiCorp.com

Date Submitted: 9/17/99 7:20:49 AM

Their address:

Pacific Power and Light  
attn: Jay Neil  
1247 Montgomery St. SE  
Albany, OR. 97321

Their telephone: (541)967-4464

Their request or Comment:

In last night's Albany Democrat-Herald, there was a statement that BPA was seeking comments on your vegetation management program. I am a Forester with Pacific Power and Light and what I would love to see you folks do is to start notifying property owners when your crews are coming through a right-of-way performing vegetation management work. We receive many irate calls every year here at Pacific Power from customers who think that work that was done by your crews was done by us. We end up having to go out and investigate each of these calls which costs us a good bit of time. Your Vegetation Management Department could certainly improve your communications with your "neighbors" so that these folks know who to contact with their questions and/or concerns.

Technical web information on submitter:

Page they were on before submitting form: Manually entered URL or retrieved page from disk cache.

The IP address user is at: 205.188.193.29

The screen resolution of their browser (Width x Height): 640 x 480

The type of browser used: Mozilla/4.0 (compatible; MSIE 4.01; MSN 2.5; AOL 4.0; Windows 98)

## BPA Public Involvement

From: Mary Leika [maryleika@hotmail.com]  
Sent: Wednesday, September 15, 1999 8:26 AM  
To: comment@bpa.gov  
Subject: BPA

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: TVM-012 RECEIPT # SEP 1 1999
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TO: BPA  
FROM: Mary Kay Leika

I am a Hoh Tribal member from the State of Washington and I am also a cultural teacher. I teach the traditional weaving of the coastal Indian throughout the Pacific Northwest. I attended a conference in Reno on June, 1999. During the California Basketweavers conference I was on a panel with the Chief of Bureau of Land Management, Department of Fisheries and Forestry from Washington D.C. The weavers were presented with a draft administrative rules concerning the gathering sites and permits to gather. I told the parties on the panel that I felt it was a violation of my treaty right to gather where we have always gathered as stated in the treaty. I also stated that I do not believe that tribal council can change my treaty right and any agreement that is signed should have been reviewed by the traditional Indian people. I have been on the tribal 21 years before I resigned in 1986, so I know all of the administrative rules that the government can present only to the council and not the people. I have reviewed your draft and I was wondering if you have contacted the tribes that are in the area for any review about the use of herbicides. I think that the statement on the draft is very important and BPA should really take into consideration the Indian people and use of the materials throughout the country. "Integrated Vegetation Management (IVM) is a strategy to cost-effective control vegetation with the most benign overall long-term EFFECT ON PUBLIC HEALTH AND SAFETY AND THE ECOSYSTEM. I was told by my mother that it is important to protect everything in our circle of life because one thing depends upon the other: everything on this earth has a purpose. As a traditional weaver and teacher I would oppose to the of any herbicides because of not knowing the effect on plants, animals, water, roots, and materials used for weaving. I think that it very important for the agencies to deal with the methods appropriately and with respect not only for Mother Earth but also the people. I would like to be informed of any hearings that will be held in the Aberdeen area so that I can attend.

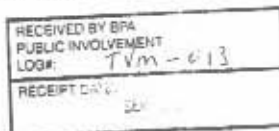
Mary Kay Leika

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**Colville Confederated Tribes**  
Vegetation Management Program DEIS Meeting Notes  
9/7/99

**Attendees:**

Adeline Fredin – Tribal Historic Preservation Officer  
Joaquin Cleveland – Vegetation Management Officer  
Bob Shank – BPA Tribal Liaison  
Hope Pennell – BPA Cultural Resources  
Stacy Mason – BPA EIS Project Coordinator



Tribal fishing, hunting, and plant gathering areas extend much farther than reservation boundaries, and include the **traditional use areas** of the twelve tribes comprising the Colville Confederated Tribes. Because the Tribes retain rights in ceded and traditional use areas, Tribal representation on ROW Management plans developed for off-reservation areas used by the Tribes (in addition to management plans for the reservation) are necessary. Snoqualmie Pass, Moses Lake, Stevens Pass are some examples of CCT gathering areas. Some of the plants that are gathered annually by Tribal members include huckleberry, elder berry, mushrooms, willows, a variety of celery's, potatoes, carrots, camas root, bitter root etc.

We should have the opportunity to represent our interests in areas that are traditional (Colvilles did not sign any document abdicating their rights). [Will send Bonneville a map of Colville's traditional use areas.]

Spiritual values of **burial sites** must be considered as well as managing ancestral remains. Although you may not disturb the ground, herbicide spraying above the ground may impact spiritual value. If lines cross burial sites, some tribal members would not like herbicide used on those sites – others might want herbicide use if it controls knapweed.

It is a federal responsibility to identify and avoid burial sites if present. Even if identified, burial sites are not always managed respectfully. To better ensure burial sites aren't impacted during vegetation control activities, burial site locations should be recorded in a database so information is retrievable and accessible to managers prior to issuing work contracts.

Concerns with **weeds along all access roads** – they need to be treated. Sometimes access roads are owned by the county or others, and used by Bonneville and no one takes responsibility for treating weeds.

Regarding washing vehicles to prevent spread of weeds/seeds -- If there is a concern with washing vehicles with power washers (oils, metals) use an airgun to blow off noxious weeds.

**SHPO's need to be on mailing lists**

THPO's, with facilities on their reservations, or off-reservation ceded and/or traditional use areas need to be on mail list.

**Confederated Tribes of the Colvilles includes:**

Wenatchee;  
Moses;  
Chelan;  
Entiat;  
Methow;  
Okanogan;  
Nespelem;  
Sanpoil;  
Lakes;  
Colville;  
Palouse; and  
Chief Joseph Band of Nez Pierce

Regarding need for **formal consultation** – Bonneville will get back to Adeline and Joaquin on how we plan to address their comments, decide then if they need to review a draft of EIS before going Final, or if consultation more appropriate at the implementation stage.

This is an opportunity for weeds to be managed together with cultural resource and traditional use area management.



## SQUAXIN ISLAND TRIBE

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# 16m-014
RECEIPT DATE: SL

September 15, 1999

Bonneville Power Administration  
Communications Office  
P.O. Box 12999  
Portland OR 97212

Stacy Mason,

The Squaxin Island Tribe appreciates the opportunity to review and comment on BPA's Vegetation Management Program. As land and fisheries managers we are currently faced with many controversial issues. Several issues of concern include salmonid health, the preservation of fish habitat and water quantity and quality. In light of the Endangered Species Act and the numerous proposed listings for wildlife and salmonid species, it has become essential for managers to lessen the environmental impacts of their activities.

After careful review of the proposed Vegetation Management Program draft EIS we feel that the proposal is biased towards the use of herbicides rather than manual or mechanical forms of vegetation control. The Tribe advocates the use of manual and mechanical methods as well as the planting of low growing native plant species. While the Tribe does not oppose the use of pesticides, we recommend that pesticides only be used as a last resort when other strategies have failed or are impractical. The Tribe does not support the introduction of non-native biological control species.

All of the pesticides listed in the BPA proposal are restricted for use in or near water and/or wetlands. Several of the pesticides are toxic to fish and have the potential to cause ground water contamination. All pesticides toxic to aquatic life and subject to soil leaching should be prohibited from further use. These chemicals include but are not limited to: triclopyr, trifluralin, pendimethalin, dimethylamine (2,4D), benflin, bromacil, halosulfuron-methyl, hexazinone, and picloram.

The management proposal does not address buffers on streams and wetlands. We have concerns about the protection of these critical areas and recommend the following: pesticides should not be used in areas associated with water or riparian/wetland vegetation. Rashin's 1992 study on aerial application of pesticides showed that pesticides were detected in streams following application on all the study sites monitored, thus being out of compliance with label requirements. The study recommended that a 90 meter buffer be applied along flowing streams. Manual and mechanical applications typically are at higher concentrations and droplet size of drift is also larger. These applications need careful monitoring to ensure that herbicides are not entering buffer areas and water.

If pesticides are applied we recommend that a minimum 750 foot buffer be applied along all streams and wetlands and that drift into buffer areas be prohibited. Stream and wetland buffers provide many functions and by allowing herbicides to enter these protected areas certain functions are lost.

NATURAL RESOURCES DEPARTMENT / S.E. 3100 Old Olympic Hwy. Box 3 / Shelton, WA 98584  
FAX 426-3971 / Phone (360) 426-9783

BPA Vegetation Management Program  
Page 2

Another concern is the identification and location of streams and wetlands. What methodology is used to detect these areas? During Rashin's pesticide study it was noted that not all stream channels were identified prior to pesticide application. Methods to identify flowing water included aerial viewing and road crossings. We suggest that all streams and wetlands be field verified and their buffers flagged prior to any maintenance activity.

### Program Alternative Recommendations

#### Right of Way Program

The Tribe supports the use of low growing vegetation to out-compete other plant communities as a way of controlling undesirable plant species. We recommend seeding only native and preferably indigenous plant and grass species. Using native/indigenous species which are climatically adapted to geographic areas raises the survivability rate and helps control the introduction of non-native/noxious weed species. Studies have also shown that native, indigenous plant species provide higher food values to animals species adapted to these regions.

For vegetation control we support the use of mechanical and manual methods. Soil disturbance can be kept at a minimum by raising mower heights as well as using vegetation species which do not require maintenance. When controlling noxious weeds many mechanical and manual methods can be very successful. We support utilizing these methods for primary control and the use of pesticides only in extreme circumstances.

#### Electric Yard Program

If ground cloths that help prohibit plant growth can be utilized in these areas it would reduce the need for maintenance as well as the use of pesticides.

#### Non Electric Program

It is preferable that landscaping utilize native plants to reduce the use of pesticides, fertilizers and water resources. Landscaping with native plants is aesthetically pleasing, virtually maintenance free, and requires no fertilizers and less irrigation.

Please continue to keep us informed, we look forward to your response to our recommendations. If you have any questions please contact me at 360-426-9783.

Sincerely,

Michelle Stetie  
Habitat Biologist

BONNEVILLE POWER ADMINISTRATION

## Transmission System Vegetation Management Program

"I'd Like to Tell You . . ."

RECEIVED BY BPA  
PUBLIC INVOLVEMENT  
TVM-015  
RECEIPT DATE  
SEP 23 1999

1. Of the choices offered in the Draft EIS, I prefer: herbicide - spot and localized for noxious weeds only. I would vastly prefer a hedgerow approach where low growth vegetation is promoted to limit destruction of fish & wildlife habitat.
2. I do not like: any kind of broadcast or aerial application of poisons of any kind.
3. You can improve the choices by: employing full time staff to do vegetation maintenance along right of way. Employ people rather than poison to control plants.
4. I have these other comments: We need to keep as much green stuff as we can in a number of species, not just grass. Also, if wildlife is allowed in the R.O.W., they will help inhibit plant growth to some degree. OVER for more →
5. I need more information about: \_\_\_\_\_

(Use back of sheet if you need more room)

☒ Please put me on your project mailing list. (You are already on the mail list if you received this in the mail.)

Name Lenora A. Oftedahl  
Address 2814 NW 108th St Vancouver WA 98685

Please mail your comments by October 9, 1999 to:  
Bonneville Power Administration  
Communications Office, KC 7  
P.O. Box 12999  
Portland, OR 97212



Debris should be composted.

If you don't kill the plants but cut and prune you won't have a revegetation question.





United States Department of the Interior

FISH AND WILDLIFE SERVICE

Snake River Basin Office, Columbia River Basin Ecosystem  
1281 South Vinland Way, Room 308  
Boise, Idaho 83726

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# TVM-616
RECEIPT DATE SEP 8 1999

September 13, 1999

Stacy Mason, Project Manager  
Department of Energy  
Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

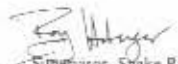
Subject: Draft Environmental Impact Statement (DOE/EIS-0285) for the Transmission  
System Vegetation Management Program  
File #501.0000

Dear Ms. Mason:

We have reviewed the subject document, and have the following comments. We recommend that you conduct detailed ground surveys for listed plant species, particularly *Spiranthes diluvialis* (Ute Ladies'-tresses) along the South Fork of the Snake River in eastern Idaho, prior to implementing any form of vegetation management in areas where this species is known to occur or areas that support potential habitat for this species. If this species is found in the project area, efforts to avoid impacts to *S. diluvialis* should be pursued.

Please contact Edna Rey-Vizgirdas of my staff at (208) 378-5239 if you have any questions regarding this matter.

Sincerely,

  
Edna Rey-Vizgirdas  
Supervisor, Snake River Basin Office

David Radtke  
PO Box 244  
Yachats OR 97498  
541 547-1087

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# TVM-616
RECEIPT DATE OCT 9 1999

September 12, 1999

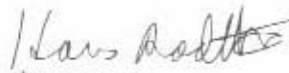
BPA  
Communications Office KC-7  
PO Box 12999  
Portland OR 97208

Subject: Comments on Draft EIS for the BPA transmission system Vegetation  
Management System

In the Siuslaw Forest, Waldport Ranger District, a major north-south BPA transmission line cuts a swath about 300 yards wide through areas of timber that will never be cut again under the National Forest Plan. These areas used to be sprayed with herbicides, creating a grassy meadow area miles long.

As we understand the BPA-USFS agreement, these transmission right-of-way areas were supposed to be managed for "wildlife". Keeping the areas in a brush cycle now does not accomplish this earlier objective. We would like the BPA and USFS to honor their past agreement by keeping the areas in a grassy meadow condition. This would provide an alternative for wildlife such as deer and elk, etc. to the older forests surrounding these transmission lines. Could the BPA and USFS return to controlling brush (by mechanical or manual means) for grassy growth?

  
David Radtke

  
HANS RADTKE

## Kuehn, Virginia (Ginny) -KCC-7

From: Mason, Stacy L. - KECN  
 Sent: Tuesday, October 05, 1999 2:30 PM  
 To: Kuehn, Virginia (Ginny) -KCC-7  
 Subject: FW: Draft EIS

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#:	TVM-019
RECEIPT	OCT 11 1999

Ginny -

If it hasn't already, the comment below from Logan Norris needs to be added into the Transmission System Vegetation Management EIS comment log.

thanks  
 stacy x5455

## —Original Message—

From: Powers, Eric N. - KECN  
 Sent: Tuesday, October 05, 1999 1:55 PM  
 To: Mason, Stacy L. - KECN; Beraud, Bob - KECN; Graetzer, Inez - KECN  
 Subject: FW: Draft EIS

I believe this comment belongs to you Stacy.

## —Original message—

From: Logan A. Norris [mailto:norrisl@FSL.OREGON.EDU]  
 Sent: Tuesday, October 05, 1999 1:52 PM  
 To: ea\_coordinator@bpa.gov  
 Subject: Draft EIS

I have reviewed the draft EIS on vegetation management. It incorporates the concepts of integrated vegetation management, making use of a variety of approaches to achieve the vegetation management goals of your program. In my opinion it takes a balanced and scientifically sound approach to the issues involved. Based on my personal scientific and technical knowledge, I believe the use of a combination of the chemical, mechanical and manual methods outlined in the EIS will be effective and can be carried out with little or no adverse environmental impact or impacts on the health of humans.

Logan Norris, Ph.D.  
 Professor of Forest Science  
 Oregon State University

## BPA Public Involvement

From: Sandy Daniel [sdaniel@co.kootenai.id.us]  
 Sent: Monday, October 04, 1999 3:33 PM  
 To: 'comment@bpa.gov'  
 Cc: 'ggibson@uidaho.edu'  
 Subject: BPA response

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#:	TVM-020
RECEIPT	OCT 04 1999



BPA RESPONSE.DOC

Attached is the comment form for the BPA Transmission System Vegetation Management Program Draft EIS. We appreciate the opportunity to comment.

Your EIS was reviewed by the Panhandle Weed Management Area Steering Committee. This group is formed of federal, state and local agency folks, as well as private citizens, and others with an interest in noxious weed control. The purpose of the group is to "erase" jurisdictional boundaries and work toward the common goal of noxious weed control and eradication. The PWMA covers the five northern counties of Idaho; Spokane and Pend Oreille Counties in Washington; Lincoln, Sanders, and Mineral Counties in Montana; and the East Kootenai District of British Columbia.

The Steering Committee voted unanimously to support BPA's preferred alternative for vegetation control. One caveat was voiced, however, that it will be important to monitor the treatment and effectiveness over a long period of time. At first blush, it appears BPA is hoping to decrease manhours and costs in annual treatments after the initial emphasis period. While such a goal can be realized, the fact is that noxious weeds can move in quickly without constant watchfulness to ensure they don't. In other words, don't turn your back after 5 years, hoping the good control you've achieved is all that needs to be done.

Thank you again for the opportunity to comment. Please let us know if we can be of assistance. Partnering to control these invaders is the best way to ensure success.

Sandy Daniel  
 Vice-Chair  
 Panhandle Weed Management Area

# Transmission System Vegetation Management Program

## "I'd Like to Tell You..."

1. Of the choices offered in the Draft EIS, I prefer: We agree with the Bonneville Power Administration preferred alternatives.

2. I do not like: \_\_\_\_\_

3. You can improve the choices by: \_\_\_\_\_

4. I have these other comments: The Panhandle Weed Management members urge you to consider scheduled visits to the sites to ensure undesirable vegetation and particularly noxious weeds are controlled after your emphasis period is completed. Noxious weeds, because of the longevity of viable seed, can quickly take over these sites even though you may have actively controlled the area for 5 years. Long-term monitoring will be required.

5. I need more information about: \_\_\_\_\_

☐ Please put me on your project mailing list. (You are already on the mail list if you received this in the mail.)

Name \_\_\_\_\_

Address \_\_\_\_\_

Please mail your comments by October 9, 1999, to:

Bonneville Power Administration  
Communications Office - KC-7  
P.O. Box 12999

## BPA Public Involvement

From: Annabelle\_L\_Rodriguez@RL.gov  
Sent: Wednesday, October 06, 1999 2:07 PM  
To: comment@bpa.gov  
Cc: Paul\_F\_Jr\_Dunigan@apimc01.rl.gov; Annabelle\_L\_Rodriguez@apimc01.rl.gov  
Subject: U.S. DOE - Richland Operations Office Comments on Transmission System Vegetation Management DEIS

Attached are the comments from the Richland Operations Office. Thank you for giving us the opportunity to comment.

Several times the Neitzel 1999 report was mentioned in our comments. A hard copy of the report will be sent to your office, however, it can also be accessed at: <http://www.hanford.gov>

A copy of the Hanford Comprehensive Land Use Plan EIS, DOE/EIS-0222F, also mentioned in our comments was sent to Tom McKinney at the Portland office. However, if an additional copy is needed please call me at the phone # below or email at: [annabelle\\_l\\_rodriguez@rl.gov](mailto:annabelle_l_rodriguez@rl.gov) <[mailto:annabelle\\_l\\_rodriguez@rl.gov](mailto:annabelle_l_rodriguez@rl.gov)>

Annabelle L. Rodriguez for Paul F.X. Dunigan Jr., RL NEPA Compliance Officer  
NEPA  
(509) 372-0277

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG# <u>Tim-elo</u> RECEIVED <u>OCT 11 1999</u>
---

**Bonneville Power Administration Transmission System  
Vegetation Management Program  
Draft Environmental Impact Statement  
(DOE/EIS-0285)**

**General Comment** - The BPA EIS did a fairly good job in presenting the case but there are a few areas that could be enhanced with a little more detail or thought. In particular, it appears that they have not given the shrub-steppe ecosystem much attention during their analysis but instead dwell mainly on forest system. The reader is supplied with reasonable maps within the document which show the location of transmission lines, but unless I missed it, there was no text on the mileage of the transmission lines in each of the major ecosystems - grasslands, shrub, and forest.

**Specific Comments:**

1. No text on mileage of transmission lines in each of the major ecosystems within the text.
2. No discussion about partnerships with public and private industries to utilize transmission right-of-ways for compatible uses that would maintain vegetation at optimum heights. Such actions as the berry industry, pulp and paper industry or Christmas tree farming were not reviewed.
3. Vegetation types need to be revised and possibly expanded. Little mention is made of the shrub-steppe ecosystem although BPA on page 117 wants the reader to consider the shrubland ecosystem as containing the shrub-steppe ecosystem. Shrublands according to BPA can be located in high precipitation areas or low precipitation areas and is also Range Land. This classification is not practical and takes in too many independent ecosystems. I feel that the shrub-steppe ecosystem, a low precipitation ecosystem, warrants its own discussion since according to the maps provided, many miles of transmission lines cross this ecosystem type.
4. Figure V-2, Vegetation Types, does not depict the shrubland ecosystem as stated on page 116 of the text.
5. The reader is at a loss as to what BPA will do where transmission lines cross shrubland ecosystems. If no vegetation management will be done in these ecosystems it should be mentioned in the document.
6. BPA failed to review the alternative method of running transmission lines underground through specially constructed cooling system thus eliminating the extensive need for vegetation management.
7. I did not find in the text of the document any discussions on State Sensitive Species, nor did I locate any information on the Migratory Bird Treaty Act.
8. For any actions that may take place on the Hanford Site, BPA must consult the document Biological Resources Management Plan.
9. For any actions on the Overlay Wildlife Refuges on the Hanford Site, BPA must consult with the US Fish and Wildlife Service which manages these lands for DOE-RL.
10. Page 28, last ¶: should roller read roller?
11. Page 31, 4<sup>th</sup> ¶: Does this statement mean BPA has also worked with Hanford?
12. Section on Replanting: has replanting been done on the Hanford site?
13. Page 59, last bullet: add "and the U.S. Department of Energy"
14. Page 119, Table V-2, see Neitzel 1999
15. Page 121, last ¶: "...crosses 10 sole-source..." however there are only 9 listed.
16. Page 122, 1<sup>st</sup> ¶, sentence 3, clarify Snake River: "...and flows through Idaho and along the Oregon-Idaho border into Washington..."
17. Page 131, Land Use Section: Add a Section for the Hanford Site. Indicate that "Coordination must be done with DOE, Richland Operations Office and the U.S. Fish and Wildlife Service for actions that take place on the Hanford Site"
18. Page 132, Under Washington add a discussion on Federal Lands in Eastern Washington, such as DOE.
19. Page 135, 5<sup>th</sup> ¶: U.S. DOE also complies with NEPA
20. Page 138, 2<sup>nd</sup> bullet: add Confederated Tribes of the Umatilla Indian Reservation

21. Page 139: see Neitzel 1999
22. Page 164, Herbicide Impacts: The Hanford site has a Weed Control Plan. A copy will be provided to BPA.
23. Page 165, Mitigation Measures: at Hanford a Cultural Resource Survey is needed before any ground disturbance is done.
24. Page 174, Mitigation Measures: Hanford shrub-steppe has not been designated as Critical Habitat, but the State of Washington has classified it as "priority habitat"
25. Pages 184 and 185: Need to include discussion of other federal managed lands (DOE, etc.)
26. Page 187, 5<sup>th</sup> bullet: To what degree has the notification been done? It appears that it was not done for Hanford, unless receiving the draft was the extent of the notification.
27. Page 195, 6<sup>th</sup> ¶, 2<sup>nd</sup> sentence: at the end of the sentence add "or exposure to downwind draft"
28. Page 195, last ¶: is "nearby residents" an Environmental Justice concern? Are there lower income people that live closer to the corridors than others?
29. Page 232, under Department of Energy: Delete Battelle Labs, replace with Pacific Northwest National Laboratory. Delete Hanford, replace with Richland Operations Office. Add Idaho Operations Office.
30. Page 233: Add Wanapum People to list of Tribal Governments.
31. Page 234: Under Washington, add the Department of Fish & Wildlife
32. Page 237: Should the Benton County PUD be added to the list of Electric Utilities?
33. Page 240: Include Tri-City Herald and Spokane-Spokesman Review.
34. Page 250: If information is used, add DOE 1999. Hanford Comprehensive Land-Use Plan Environmental Impact Statement, DOE/EIS-0221F.



# Oregon

John A. Klutznick, M.D., Governor

## Department of Fish and Wildlife

Habitat Division  
2801 SW First Avenue  
PO Box 59  
Portland, OR 97207  
(503) 872-5255  
FAX (503) 872-5269  
TTY (503) 872-5259  
Internet [www.dfw.state.or.us/](http://www.dfw.state.or.us/)



October 5, 1999

Bonneville Power Administration  
Communications Office - KC-7  
P.O. Box 12999  
Portland, OR 97208

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# TV07-023
RECEIPT DATE: OCT 07 1999

### RE: Comments on Draft EIS for the Transmission System Vegetation Management Program

The Oregon Department of Fish and Wildlife (Department) appreciates the opportunity to comment on Bonneville Power Administration's Transmission System Vegetation Management Program. The Department's comments pertain to the vegetation management in rights-of-way, rather than electric yards and non-electric facilities.

The Department generally supports the Bonneville Power Administration's (BPA) proposed mitigation measures to reduce the impacts on fish, wildlife and their habitat. However, the Department would request that BPA consider the following changes or additions to those mitigation measures:

First, the Department strongly supports the use of riparian buffer zones and herbicide-free zones described in Tables VI-2 and VI-3. However, due to their high toxicity, the Department requests that BPA refrain from using the following herbicides within 30.5 m (100ft.) of waterways, **regardless of the application method**: 2,4-D (highly toxic to aquatic organisms in some formulations), Benefin (highly toxic to aquatic organisms), Diuron (highly toxic to aquatic invertebrates), Pendimethalin (highly toxic to aquatic organisms), and Trifluralin (very highly toxic to aquatic organisms).

Second, the Department requests that BPA limit use the following herbicides due to the lack of data on the toxicity to fish and/or wildlife: Halosulfuron-Methyl, Imazapyr, and Sulfometuron-Methyl.

Third, the site-specific planning steps for water resources state that "(i)f using herbicides, it may be necessary to leave untreated zones (filter strips) to preclude the possibility of herbicide movement from the application site to adjoining water bodies." (emphasis added) The Department requests that BPA always apply this mitigation measure near adjoining water bodies.

Fourth, the mitigation measures for soils state BPA will "consider reseeding or replanting seedlings on slopes with potential erosion problems" (emphasis added). The Department requests that BPA actually reseed or replant seedlings on slopes with potential erosion

problem (rather than just considering doing so), for slopes with 10 percent of soils exposed.

Finally, the Department requests that BPA consider timing restrictions to reduce impacts on wildlife species in addition to federally listed threatened and endangered species. The state of Oregon has listed several species as threatened or endangered that have not been listed by the federal government. These species include the Arctic Peregrine Falcon (*Falco peregrinus tundrius*), the Kit Fox (*Vulpes macrotis*) and the Wolverine (*Gulo gulo*). The Department has also listed numerous species as "sensitive." Prior to significant vegetation management activities, BPA should contact local Department biologists to discuss timing such activities to avoid unnecessarily impacting these species.

If you have any questions, please contact me at (503) 872-5255, extension 5587.

Sincerely,

Kimberly Grigsby  
Special Projects Coordinator  
Habitat Division

C David McAllister, HD, ODFW



United States  
Department of  
Agriculture

Forest  
Service

Colville  
National  
Forest

Federal Building  
765 South Main  
Colville, WA 99114  
509-684-7000  
Fax: 509-684-7280

File Code: 2150

Date: October 4, 1999

BONNEVILLE POWER ADMINISTRATION  
COMMUNICATIONS OFFICE - K-7  
PO BOX 12999  
PORTLAND OR 97212

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG# TVM-025 RECEIPT# OCT 11 1999
--

Dear Sirs:

We are responding to your request for comment on your Draft EIS Transmission System Vegetation Management Program. BPA has several transmission lines that cross the Colville National Forest. Many of these rights of ways contain noxious weeds, and we are very concerned that if these infestations are not treated, they will remain a perennial source of reinfestation of adjoining National Forest System lands. For this reason we are supportive of your preferred alternative R4, which approves all methods of control.

However, when planning ROW treatments on the Colville Forest, as well as other National Forest lands in Region 6, I want to remind you that BPA must also comply with the terms of the Mediated Agreement to the EIS Managing Competing Unwanted Vegetation. This document emphasizes prevention activities, but it also restricts the types of chemicals that can be used on National Forest System lands. If you do not have a copy of this document you can obtain one from our Portland Office or from our office in Colville.

When you plan a specific project on the Colville Forest, we are more than willing to coordinate with you and help insure that the terms of the Mediated Agreement, as well as other applicable laws and regulations regarding vegetative treatment on National Forest System lands are followed. Please contact John Riddington at our Colville office (509-684-7191) if you have further questions or need assistance.

Sincerely,

ROBERT L. VAUGHT  
Forest Supervisor

cc: jridlington



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# VII

## Public Comments and Responses

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG# TVM-025 RECEIPT# OCT 12 1999
--

BPA F-1216-02  
(Rev. 8-1)  
(Prescribed by BPA 10/98)

### U.S. DEPARTMENT OF ENERGY - BONNEVILLE POWER ADMINISTRATION 800 TELEPHONE LOG

LOG NO.	DATE
	10/12/99
TIME	

NAME

BRUCE BUCKLEY

PHONE (IF APPLICABLE)

PO Box 525

ADDRESS

Wahport, OR 97144

PHONE NO.

541-563-2726

INFORMATION REQUESTED/COMMENT

Comment - Vegetation Mgmt/Agreement

Do to the fact that there are a number of domestic water systems, particularly with the first four towns south of the Alsea River. Don't want to see any herbicide application to those areas. They have a number of surface systems in the area and some wells south of the first four towns.

Thank you for letting me comment.

## Alliance for the

PO Box 8731 • Missoula, Montana • 59807  
Ph: 406-721-5420 • Fax: 406-721-9917



## Wild Rockies

Web: [www.wildrockies.org](http://www.wildrockies.org)  
Email: [awr@wildrockies.org](mailto:awr@wildrockies.org)

October, 1999

Bonneville Power Administration  
Communications Office  
P.O. Box 12999  
Portland, OR 97212

Re: Transmission System Vegetation Management Program

Dear Bonneville Power Administration:

On behalf of the Alliance for the Wild Rockies (AWR), I am submitting comments pertaining to the Transmission System Vegetation Management Program DEIS. AWR appreciates the opportunity to participate in this planning process and we support the Administration's effort to control vegetation using means which minimize adverse environmental impacts.

However, AWR is concerned several of the preferred alternatives, especially alternatives, especially the R4/VS3 alternative which would permit Bonneville to utilize broadcast and aerial herbicide treatments, impacting both target and non-target vegetation. Herbicide treatments have caused historic and repeated problems at numerous junctures, including manufacturing, transport, storage, application, dispersal, transformation into other toxic chemicals and disposal. In particular, herbicide applications do nothing to change the conditions which allowed the noxious weeds or other vegetation to establish in the first place, and such applications may leave the soil bare, a condition that favors re-establishment. Therefore, the dependency on toxic chemicals to manage vegetation is difficult to overcome unless it is part of an explicit program to prevent the re-establishment of such vegetation and to eliminate the need to use herbicides in the future.

In addition, the direct effects of numerous herbicides are being found to affect the endocrine systems of both wildlife and humans. This can compromise development, reproduction, behavior, sexual integrity, and immune and nervous system functioning. Furthermore, herbicide use may include the removal of vegetation upon which wildlife species rely, increases in water temperature as vegetation is removed, etc. Finally, the cumulative effect of herbicide applications are difficult to quantify and are not adequately understood.

AWR appreciates the Administration's need to control vegetation. However, based upon the above discussion, the use of chemical control agents should be revisited. More specific comments on the DEIS are provided below.

**Biological Control Agents (S-9)** - the usefulness of sheep were discounted due primarily to logistics. However, Bonneville could utilize the services of a 3rd party to provide sheep, thereby eliminating logistical problems. The use of sheep should be revisited.

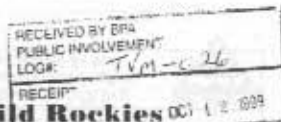
**Herbicide Use** - the DEIS states that wildlife would not be impacted by herbicide use. Since the direct impacts associated with herbicides are at best uncertain, and will vary depending upon the chemical agent, this statement does not seem well

Missoula Office:  
801D Sherwood St. • Missoula, MT • 59802  
406-721-5420 • [awr@wildrockies.org](mailto:awr@wildrockies.org)

Boise Office:  
1714 Haren • Boise, Idaho • 83702  
208-386-9014 • [wildrockies@boisemail.com](mailto:wildrockies@boisemail.com)

Ecosystem Defense Program  
406-542-0050  
[owd@wildrockies.org](mailto:owd@wildrockies.org)

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founded (S-7). Will areas be surveyed in advance to ascertain the presence of organic farming operations (S-7)? Will Bonneville map all right of ways to determine soil conditions, slope, etc. in order to determine whether or not granular herbicides should be prohibited (S-7)?

**Reseeding (S-9)** - when reseeding is undertaken will native species be used? More specifically, will the Administration select plants that will provide food, hiding cover, thermal cover, nest sites, etc. for grizzly bear, elk, migratory birds and other wildlife?

**Alternative MA2 (S-11)** - AWR supports this alternative assuming that native plants will be used and habitat improvements will be incorporated into this program. The reliance on spot-herbicide treatments should be minimized or eliminated.

**Alternative VS3 (S-16)** - if herbicides are used, only noxious weeds and deciduous plants that compete with the low growing plants should be targeted. Using herbicides on any type of vegetation would likely have adverse environmental impacts and should not be undertaken. In particular, the Administration should not use herbicides on plant species consumed by wildlife.

**Alternative NE2 (S-17)** - the argument for using herbicides is often related to access and cost effectiveness. Therefore, landscaping at non-electric facilities should be readily able to utilize non-herbicide methods to manage noxious weeds.

**Corridors (pg. 12-13)** - the EIS discusses feathering. However, inadequate analysis is presented as to edge effects, how to minimize such effects, impacts on interior forest. The vegetation management plan for right of ways should consider corridors and their impacts on particular wildlife species in more detail. Although the Administration wants the longest possible maintenance free period, shorter period should be considered if impacts to threatened and endangered species are possible.

AWR supports the MA2 alternative, with a focus on manual and biological control agents. Mechanical methods should be used sparingly, and only where soil conditions and wildlife can readily tolerate such invasive procedures. Herbicides should not be utilized based on the above discussion. However, if such chemicals are used, under no circumstances should broadcast and aerial methods be employed.

AWR appreciates the opportunity to comment on the proposed noxious weed control strategy.

Sincerely,

Caryn Miske  
Ecosystem Defense Intern



B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

## Transmission System Vegetation Management Program

## "I'd Like to Tell You . . ."

1. Of the choices offered in the Draft EIS, I prefer:

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# <u>TVM-017</u>
RECEIPT <u>Oct 11 1999</u>

2. I do not like:

3. You can improve the choices by:

4. I have these other comments: I would like to see prior notification of exactly when our area will be aerial sprayed. This could be done through newspapers giving us an approximate date of application, and then you supplying us with a hot-line number to call to get a specific date and time (subject to change because of weather); we may have to call more than once as the hot line is updated. This would be so beneficial because we could keep our children in on that particular day and not find more information about allow them to play outside (especially beneficial for those of us who live very near power lines) We could also move livestock; change out water supplies etc just for safety measures.

Also, I know you need to be in the growing season for aerial spray, but  
(Use back of sheet if you need more room) over phone

- ☐ Please put me on your project mailing list. (You are already on the mail list if you received this in the mail.)

Name Terri HoinessAddress 24192 Cox Rd. Rainier OR 97043

Please mail your comments by October 9, 1999 to:

Bonneville Power Administration  
Communications Office - KCL  
P.O. Box 12999  
Portland, OR 97212



if there is anyway you could spray before apples and berries have been set on (in other words, spray during the bloom stage <sup>or prior</sup> - the ~~ear~~ earlier the better) This would greatly reduce any chance of ingesting contaminated fruit by our children (We do have orchards from old homesteads close to power lines where drift could be questionable in my opinion)

Thankyou for putting such a nice informational packet together. While I personally am not too comfortable with aerial spraying, I understand it is least cost, and most effective for you. All that I personally can ask is that you please keep us informed so that we have the opportunity to use as many safety measures on our behalf as we see fit to protect our families



Transmission System Vegetation Management Program

RECEIVED BY BPA PUBLIC INVOLVEMENT TRANSMISSION PROGRAM
RECEIPT DATE OCT 14 1999

"I'd Like to Tell You..."

- Of the choices offered in the Draft EIS, I prefer: MA2 on ROW;  
R4, Best Alt.; VS3 Any way; E1, selective  
herbicide
- I do not like: Current noxious weed control or  
lack of noxious weed control as currently  
practiced in Skamania County (Westend) by  
Mr. Tallison of your Olympia Office.
- You can improve the choices by: \_\_\_\_\_
- I have these other comments: Your idea of controlling all  
vegetation as necessary while establishing  
ground cover will prove to be the best  
economically and environmentally
- I need more information about: What low growing species  
do you plan to use that will eat -  
compete noxious weeds - any suitable  
for roadside use?

(Use back of sheet if you need more room)

☐ Please put me on your project mailing list. (You are already on the mail list if you received this in the mail.)

Name: Don Wallengruber

Address: \_\_\_\_\_

SKAMANIA COUNTY  
Noxious Weed Control Board  
P.O. Box 790  
Stevenson, Washington 98648

Please mail your comments by October 9, 1999 to:

Bonneville Power Administration  
Communications Office - KC-7  
P.O. Box 12999  
Portland, OR 97212



United States  
Department of  
Agriculture

Forest  
Service

Mt. Baker-Snoqualmie National Forest  
21905 64th Avenue West  
Mountlake Terrace, WA 98043-2278

File Code: 2080

Date: October 13, 1999

Ms. Stacy Mason  
Bonneville Power Administration  
Communications Office  
P.O. Box 12999  
Portland, OR 97212

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#
RECEIPT DATE OCT 14 1999

Dear Ms. Mason:

Thank you for the opportunity to comment on BPA's Draft Environmental Impact Statement for your Transmission System Vegetation Management Program (DOE/EIS-0285).

In your Electric Yard Program, we support Alternative E1, because it appears that other alternatives pose a direct threat of electrocution to your maintenance workers.

In your Right-of-way Program, we support Alternative MA2 (Promotion of low-growing plant communities). We support Method Package R3 (herbicides permitted with spot, localized, and broadcast application). We feel that the environmental risks of aerial application of herbicides to non-target species are unacceptable. We support Vegetation Selection VS-1 (herbicides will only be used on noxious weeds). We support the use of alternative methods to control other non-desirable vegetation. Impacts from other methods can be mitigated in various ways (e.g. noise disturbance to T&E wildlife can be timed to avoid their nesting and denning periods).

In your Non-electric Program we support Alternative NE1 if the herbicides will only be used on noxious weeds and not to control other undesirable vegetation. It is unclear from the description if this was your intent since it just mentions "weeds" and not "noxious weeds." If the intent is to use herbicides to control any undesirable vegetation, then we support Alternative NE2.

Please contact us if you would like us to elaborate on the rationale for our preferences described above. Again, thank you for the opportunity to comment.

Sincerely,

John Phipps  
JOHN PHIPPS  
Forest Supervisor



(425) 775-9702

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## Vegetation Management Draft EIS

Comments - 9/15/99 Public Meeting  
Oregon State Office Building

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#:	TVM-030
RECEIPT DATE:	OCT 1, 1999

## Commenter

## Comment

- 2 Will BPA allow removal of vegetation along the right-of-way by the general public?
- 2 Don't spray any poisons
- 3 Plant trees under the lines that don't grow high
- 3 Low-growing is better than herbicides
- 3 Fish and animals need protection against herbicides
- 9 Vegetation maps - do they show the vegetation types under all the lines? Portland shows-up as agriculture.
- 7 Like idea of vegetation management alternatives and discussing them with landowners.
- 6 Really like your meeting layout and graphics.
- 7 What do you do with the trees you cut?
- 11 I want to know why (the) Al Gore mandate to sell electric power to aluminum companies reduced rate. I pay for it that through my bill.
- 11 Aluminum companies aren't giving much to NW (not many jobs) while we support them.
- 11 Aluminum companies nickel and dime the working person
- 11 Old plants are gone in a few years anyway

\*\*\*

ijk/KECN vegmngt/pi

Affiliated Tribal Meeting  
Comments Received at  
Vegetation Management Program DEIS Display Table  
9/29/99

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#:	778-031
RECEIPT DATE:	OCT 1, 1999

- An individual from the Quinalt Tribe had a comment regarding herbicides as they relate to labor; that local labor should be used to control vegetation in lieu of herbicides. Un- or under-employment was unacceptably high on tribal lands.
- An individual from the Warm Springs Tribe had concerns that Bonneville had incessant intrusions upon the reservation lands; the cumulative effects of all activities was disruptive to their lifestyle and may negatively impact the cultural value of tribal lands.
- An individual from the Warm Springs tribe commented that extreme care should be taken to ensure that herbicides are correctly applied.
- An individual from the Colville Tribe was concerned that noxious weeds were becoming ubiquitous on tribal lands. The member also commented that bio-control agents for noxious weeds are not very effective.
- An individual from the Warm Springs Tribe that worked in cultural resource section commented that Bonneville needs to consider the value of the Tribe's cultural sites when planning vegetation control activities. The commentor expressed appreciation for Bonneville's active role in practicing good stewardship of natural resources.
- An individual from the Yakama Nation had general question regarding the scheduling and implementation of operation and maintenance activities, including vegetation control and personnel performing vegetation control.
- One visitor had questions about the planning steps.
- Several commentors stated that trust needs to be built between Bonneville and the Tribes for planning and implementing programs. Firmly established mutual trust would provide long-term relations between the Tribes and Bonneville.



United States  
Department of  
Agriculture

Forest  
Service

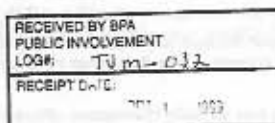
Modoc  
National  
Forest

800 West 12<sup>th</sup> Street  
Alturas, CA 96101  
530-233-5811

File Code: 1950

Date: October 9, 1999

Carol Borgstrom, Director  
Bonneville Power Administration  
Communications office  
P.O. Box 12999  
Portland OR 97212



Dear Ms. Borgstrom:

The Modoc National Forest would appreciate your consideration of the following comments in development of the Final Transmission System Vegetation Management Program Environmental Impact Statement.

- Formal tribal consultation on a government-to-government basis with potentially affected tribes is required for the federal lands under the administration of the Modoc National Forest. This consultation requires a one on one meeting between the tribes and a decision maker for the Bonneville Power Administration in addition to providing opportunities for written comments. The Modoc NF has provided the list of tribal representatives. Please let us know if this consultation has already taken place and the results.
- It is our understanding that the current authorizations and agreements between Bonneville Power Administration and the Modoc National Forest continue to be in effect. The process outlined in the DEIS is not consistent with these agreements. Until such time as Bonneville Power Administration completes the processes necessary to formally transfer land management responsibilities from the USDA Forest Service to the US Department of Energy for the right-of-way, the approving and deciding official for site-specific projects, which may effect the environment, remains the appropriate Forest Service line officer.
- BPA can greatly assist Forest Service decision makers by documenting environmental effects and considerations in a more complete statement than a checklist (Environmental documentation - page 81).
- Page 136 identifies the current BPA facilities covered by direction in the Northwest Forest Plan on the Modoc National Forest. This is not currently the case. All current facilities operated by BPA under agreements with the Modoc National Forest are outside the area of the Northwest Forest Plan.
- Please change the mitigation measure on page F-2 of Appendix F to read, "When seeding, use native species unless the use of non-native species is approved. The

appropriate Forest Service Line Officer must approve all seeding mixtures in advance. Consider topping trees as an alternative to felling."

- Page 56, provides for the use of "public contact to help find out about any special uses of the land, or other issues or concerns that might need consideration when determining or scheduling vegetation control" on an only if needed basis. We suggest always use public contact and involvement within Modoc County. The Modoc County Board of Supervisors has established a land use committee to consider and comment on Federal Agency actions that may occur within the county.

Please contact Robert Haggard, Public Services Staff Officer, of my staff if you have any questions or comments concerning these issues.

Sincerely,

/s/ Robert T. Haggard  
for  
SCOTT D. CONROY  
Forest Supervisor



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United States  
Department of  
Agriculture

Forest  
Service

Willamette National  
Forest

211 East 7th Avenue  
P. O. Box 10607  
Eugene, OR 97448

File Code: 2600 Wildlife/Fish and  
Sensitive Plant Habitat Management

Date: October 7, 1999

RECEIVED	BPA
PUBLIC	COMMENT
LOG#	70 m - 123
RECEIPT	100 1 100

Stacy Mason, Project Manager  
BPA  
Communications Office-KC-7  
PO Box 12999  
Portland, Oregon 97208

Dear Ms. Mason,

Thank you for the chance to review the Transmission System Vegetation Management Program DEIS. Overall we feel the document does a good job of providing alternatives for management of vegetation as well as providing a process to accomplish site specific plans that will meet a variety of resource needs on the ground. We look forward to working with you on site specific management plan updates for each of the three corridors that are located on the Willamette National Forest as a follow up to this EIS. It appears that the planning steps outlined in the document will ensure that site specific concerns are addressed.

Our greatest concern with the powerline corridors at this time is centered on noxious weeds. A sizable population of spotted knapweed has been located within the corridor near Blue River along the McKenzie River. This species is considered a new invader and as such has the highest priority for treatment on this forest. Each of the three corridors also have large amounts of scotch broom, blackberry and other noxious weeds. We would like to work with the BPA to develop an active management strategy to address this concern.

The following are comments specific to the DEIS.

#### Approach

We support the overall approach described in Alternative MA2 using Integrated Vegetation Management. We feel as if the overall management strategy, to focus on creating low-growing (preferably native) plant communities under powerline corridors, is a sound one.

Our Forest is in the process of completing a new Environmental Assessment for Integrated Weed Management. Mark Newbill, from your Eugene office, is on our mailing list. Many parts of the BPA preferred alternative will dovetail well with the Willamette EA.

# VII

## Public Comments and Responses

#### Methods

Alternatives R2 or R3 are both consistent with the methods outlined in our new EA. The Willamette EA addresses manual, mechanical, biological and herbicide control methods in powerline corridors. Treatment methods will be dominantly spot and localized, although some boom spraying from ATVs or trucks could be done.

#### Vegetation Selection

As stated above, the Forest is very supportive of vegetation treatments with herbicides for noxious weeds (VS1). If deciduous species need to be treated on Willamette NF land (VS2 or VS3), additional NEPA analysis will need to occur because the 1999 forestwide Integrated Weed Management EA covers herbicide use on only newly invading weed species.

#### General Comments

Page 35. It may be helpful to add a sentence to the 4th paragraph that explains perhaps only a subset of these herbicides may be available to use on certain lands. The Willamette EA only provides for the use of 2 of these herbicides, glyphosate and/or triclopyr.

Page 55. Mitigation measures for noxious weeds. **Bullet #5:** Washing vehicle clause. How about adding wording about developing sites to wash vehicles in association with land owners/managers as part of site-specific management plans.

Page 56. Mitigation measures for noxious weeds. **Bullet #6:** Reseeding should follow all ground-disturbing activities to help compete with weed seed in the soil. All seed should be state-certified weed-free. If one were to use a modifier on this sentence, it would be more appropriate to use "when appropriate" not "when practical".

Page 62 and Page 161. It's somewhat unclear exactly what these riparian zones apply to. It appears to be a mix of different standards, some are BPA some are BLM and others are NRCS. The Northwest Forest Plan buffers are only displayed in Appendix F. Perhaps it would be better to state that these are examples of potential riparian zones but that site specific locations and management plans will dictate the actual distances. Restrictions on buffer distances may also be applied as a result of consultation for listed fish species under the Endangered Species Act.

#### Corridor Specific Issues

Although some of these issues will be addressed only at the site specific scale we list them here for your consideration.

- The corridor near Blue River has a new invader noxious weed (as mentioned above) that needs immediate treatment. This corridor is also very densely stocked with scotch broom. We are very interested in updating the management plan soon. The Blue River District is currently looking at options to restrict access along the road beneath the powerline with a gate. BPA access would still be provided.
- The corridor near Lowell was mentioned extensively in the watershed analysis for Lookout Point. The BPA corridor is located in and around western pond turtle (a Forest Service Region 6 sensitive species requiring special management) habitat. Specifically, timing of vegetation



management needs to take into account the migration of pond turtle mothers through the corridor for nesting.

- Detroit Ranger District personnel will be writing a comprehensive management plan for the Pacific Gas and Electric (PGE) powerline corridor, which parallels the Detroit BPA corridor for approximately 18 miles, in the next year, as a part of the relicensing process for the PGE corridor. It would be beneficial for BPA to be involved with this site-specific management because working together could potentially lower costs for both PGE and BPA for management activities, surveys, etc. It would be beneficial for the Willamette NF to have a single set of guidelines for managing both corridors.

We look forward to the FEIS and to the update of site specific management plans for each of the three corridors that pass through the Willamette National Forest.

Thank you for the opportunity to review the DEIS.

Sincerely,

  
for  
DARREL L. KENOPS  
Forest Supervisor

cc: Russell Peterson, USFWS State Supervisor  
William Stelle, Jr., Regional Administrator NMFS  
Katherine Beale, Wildlife Biologist Army Corps of Engineers  
Greg Concannon, Wildlife Biologist Pacific Gas & Electric



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# 1000-034
RECEIVED

OCT 8 1999

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

Bonneville Power Administration  
Communications Office  
P.O. Box 12999  
Portland, OR 97212

Dear Sir/Madam,

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA), the U.S. Environmental Protection Agency (EPA) is providing comments on the Department of Energy Bonneville Power Administration's Draft Environmental Impact Statement (DEIS) on the Transmission System Vegetative Management Program (DOE/EIS-0285).

Thank you for the opportunity to review this DEIS which establishes planning steps for managing vegetation for projects in the states of CA, ID, MT, OR, UT, WA and WY. Projects in these states will be tiered off of this EIS. Bonneville Power prepared this DEIS because of their responsibility to manage vegetation beneath power lines and at electric substations. The DEIS analyzes four vegetation control methods, 24 herbicide ingredients, and four herbicide application techniques. It examines alternative management approaches for rights-of-way, electric yards and non-electric facilities.

EPA has rated this DEIS EC-1. The rating of "EC" indicates that EPA has *environmental concerns* with the preferred alternatives. We suggest measures to reduce the environmental impacts of these alternatives. The rating of "1" indicates that the analytical information presented is adequate, although we suggest some clarifying language.

EPA agrees with Bonneville's preferred management approach (alternative MA2) that allows use of herbicides in combination with other methods to promote low-growing plant communities at rights-of-way. This approach should minimize impacts on non-target species.

EPA would prefer a management plan that avoids the use aerial or broadcast methods for applying herbicides. However, we understand that there are terrain or weed conditions where aerial or broadcast spraying of powerful herbicides according to the label is the only feasible approach. Accordingly, EPA agrees with alternative R4, but urges Bonneville Power to restrict the use of aerial and broadcast methods in upcoming projects as much as possible so as to avoid

Internet Address (URL) • <http://www.epa.gov>  
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deleterious effects on non-target plants and wildlife.

EPA can also support alternative VS3 which would allow herbicide use on any vegetation, but urges Bonneville Power to limit application whenever feasible to noxious weeds and deciduous plants and trees capable of re-sprouting.

Finally, EPA agrees with Bonneville's proposed approaches to managing vegetation at electric yards and non-electric facilities, although Bonneville should attempt to minimize the use of herbicides when implementing these approaches.

In addition to the mitigation measures Bonneville proposes to minimize adverse ecological impacts, EPA suggests that the Final EIS reflect the following:

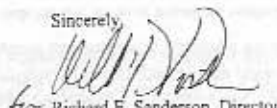
- Vegetation management projects should select herbicides, application rates, and methodologies that are the least disruptive for adequately controlling the weed situation.
- When selecting a particular herbicide, consider using newer products, which often pose lower risks. Also, consider applying the herbicide at less than the maximum label rate where the lower level is efficacious.
- Projects should avoid to the extent feasible certain ingredients which are broad-spectrum and/or persistent and/or appear to affect non target species. Of particular concern are bromacil, 2,4 D, dichlobenil, oryzalin, pendamethalin, triclopyr, and trifluralin. EPA is reassessing these ingredients for future use under the Food Quality Protection Act of 1996 which requires the Agency to consider all non-occupational avenues of exposure in its risk assessment.
- Bonneville should develop guidance for field staff responsible for implementing the program on use of low-impact approaches.

Finally, EPA suggests clarifying language on page 61 under the Section 404 discussion. The sentence in parentheses should be revised as follows:

(In certain circumstances vegetation debris left in a stream or wetland could be considered fill material for purposes of Section 404 of the Clean Water Act. Questions concerning the regulation of particular activities under Section 404 should be directed to the Regulatory Branch of the local U.S. Army Corps of Engineers District Office.)

Again, we appreciate the opportunity to review this DEIS. Please contact Susan Absher at 202-564-7151 if you have any questions about these comments.

Sincerely,

  
for Richard E. Sanderson, Director  
Office of Federal Activities



David Radtke  
PO Box 244  
Yachats OR 97498  
541 547-3087

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: TUM-635 RECEIPT: OCT 11 1999
--

September 12, 1999

BPA  
Communications Office KC-7  
PO Box 12999  
Portland OR 97208

Subject: Comments on Draft EIS for the BPA transmission system Vegetation Management System

In the Siuslaw Forest, Waldport Ranger District, a major north-south BPA transmission line cuts a swath about 300 yards wide through areas of timber that will never be cut again under the National Forest Plan. These areas used to be sprayed with herbicides, creating a grassy meadow area miles long.

As we understand the BPA-USFS agreement, these transmission right-of-way areas were supposed to be managed for "wildlife". Keeping the areas in a brush cycle now does not accomplish this earlier objective. We would like the BPA and USFS to honor their past agreement by keeping the areas in a grassy meadow condition. This would provide an alternative for wildlife such as deer and elk, etc. to the older forests surrounding these transmission lines. Could the BPA and USFS return to controlling brush (by mechanical or manual means) for grassy growth?

David Radtke  
David Radtke

Hans Radtke  
HANS RADTKE



United States  
Department of  
Agriculture

Forest  
Service

Plains/Thompson Falls  
Ranger District  
(406)836-3831

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: TUM-636 RECEIPT: OCT 11 1999
--

P.O. Box 429  
408 Clayton  
Plains, MT 59859

File Code: 2730  
Route To: Lolo Lands

Date: October 4, 1999

Subject: Comments to BPA's Draft EIS for Transmission System Vegetation Management

To: Lisa Subcaskey

Here are my comments on BPA's DEIS, they are broken out into the following categories: Riparian Protection, Use of Herbicides, Project Proposal Notification, NEPA Responsibility, Other Alternatives and USFS to FS.

#### Riparian Protection

1) Table III-1 Riparian Buffer Zones (page 62) needs to be thoroughly reviewed by fisheries biologist to ensure INFISH standards are being met with the proposed buffer zones.

2) Table III-2 Herbicide Free Zones (page 62) should be expanded to describe how close to natural streams the various proposed herbicides can be used.

3) The study cited on page 167 has been taken completely out of geographical context. The climate, soils, vegetation are all completely different between New York and the Pacific Northwest. Surely there is a study applicable to the Pacific and Inland Northwest that discusses the impacts of removing overstory along stream reaches.

4) Page 169, Mitigation Measures, states "Apply all appropriate mitigation measures for water bodies". These "appropriate mitigation measures" should be referenced or stated as there is no way of knowing what these measures are.

#### Use of Herbicides

1) Lolo National Forest Noxious Weed FEIS and Lolo Forest Plan Amendment 11 contains many mitigation measures for use of herbicides on Lolo National Forest, these requirements will need to be incorporated into any spray project proposals which will occur on the Lolo. I would suggest a copy of Amendment 11 be forwarded to BPA for inclusion into their planning documents if this has not already been done. Also DEIS Appendix F does not contain all of the mitigation measures found in Amendment 11.

2) The BPA DEIS seems have a fairly subjective tone making assertions that herbicides are not harmful, yet the DEIS does not cite references to fully support this position. For example, on page 168, the DEIS states "There is little potential for fish to be exposed to herbicides: mitigation measures.....only a relatively small amount of area would be treated within a landscape." The DEIS does not state the effectiveness of the mitigation measures nor does it cite research work that confirms this assertion.

The DEIS also makes some contradictory statements. For example, on page 168, the DEIS states that "many of the herbicides proposed by Bonneville are low in toxicity to fish" yet in Table VI-6 (page 175) 11 of the 24 herbicides are listed as moderately to highly toxic to aquatic resources, in addition, 2 of the herbicides listed in this table do not have any aquatic toxicity data. 11 of 24 possibly



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10/11/99

13 of 24 herbicides being moderately to highly toxic does not match the assertion on page 168 that many of the herbicides are low in toxicity.

#### NEPA Responsibility

On Page 185, BPA makes the statement that "the decisions on vegetation management of rights-of-way across USFS and BLM managed lands are Bonneville's and therefore Bonneville is responsible for complying with NEPA." And goes on to state "The USFS and BLM usually would not have a decision to make (that would trigger their NEPA process) unless the proposed vegetation management were not consistent with their existing plans and regulations."

The Memorandum of Understanding between BPA and USFS dated 1974 (FSM 1531.73a) provides for BPA's occupancy and use of National Forest lands consistent with laws applicable to the management of National Forest System in Item 1. Also, Item 6 provides for a subsidiary MOU to implement the master agreement. In the Subsidiary Memorandum of Understanding dated 1974 (FSM 1531.72a, FSM B/83 R-1 Supp 41) Section 1B. *Environmental Analyses and Environmental Impact Statements* states that "Bonneville and the Forest Service will conduct environmental analyses and prepare environmental impact statements in accordance with their individual procedures". It also states that "When an environmental statement is to be prepared, the agency initiating the proposal will take the lead in statement preparation. The other agency will actively participate in development of the statement by (1) providing.....existing information..... and (2) review and comment on the draft and final environmental statement."

Thus the wording in the DEIS is not entirely correct and could mislead agency as well as public individuals as to whose responsibility the decision making really is. As I see it the FS has only granted BPA the occupancy and use of National Forest lands not the ownership nor management responsibility of these lands, in addition the FS and BPA have agreed that environmental assessments will be conducted in accordance with their individual procedures. The fact that (1) National Forest land management under BPA facilities is a responsibility that remains with the Forest Service and (2) the FS must comply with FS NEPA procedures, places the decision making responsibility squarely with the Forest Service for activities on National Forest lands.

This section should be rewritten in order to clarify BPA's role as they cross National Forest lands. The existing MOUs provide a lot of direction regarding roles of the various agencies.

#### Project Proposal Notification

Another bullet on page 58 under USFS managed lands needs to be added which includes BPA Project Managers notifying the FS in advance of any proposed projects (non-emergency) involving NF lands. This is needed in order that FS NEPA procedures are complied with. This requirement is already contained in the Right of Way Management Plan for BPA facilities on the Plains/Thompson Falls Ranger District but I'm not sure of other Districts and Forests thus would be helpful to reiterate the message again in the FEIS.

#### Other Alternatives

The DEIS only addresses alternatives that manage vegetation in order to maintain safe operating clearances. The EIS does not address any alternative which manages the transmission facilities in order to maintain safe operating clearances. I'm not an expert of transmission facility engineering but would think that in some specific instances in which raising tower structures, adding new towers, minor route realignments, possible even managing current loads during periods of high temps to

prevent unsafe line sags could be implemented as a way to allow vegetation to develop naturally and provide critical resource benefits while continuing to transmit electricity safely. This EIS process could address the specific planning steps which would identify specific conditions/locations where managing the transmission facilities rather than the vegetation would be appropriate. Further site specific analysis would be needed to determine exact locations of new towers, right-of-way clearings, etc.

#### USFS to FS

A small item but isn't the USFS abbreviation incorrect and really should be either USDA-FS or just FS.

Sincerely,

Fred Haas  
Resource Forester  
Plains/Thompson Falls Ranger District





Gray Davis  
GOVERNOR

STATE OF CALIFORNIA

# Governor's Office of Planning and Research State Clearinghouse

STREET ADDRESS: 1400 TENNESSEE STREET, SUITE 222, SACRAMENTO, CALIFORNIA 95834  
MAILING ADDRESS: P.O. BOX 1044, SACRAMENTO, CA 95812-0444  
408-445-0001 FAX 408-425-1000 www.opr.ca.gov/clearinghouse.html



Loretta Lynch  
DIRECTOR

October 4, 1999

Stacy Mason  
Bonneville Power Administration  
905 NE 11th Avenue  
KECP-4  
Portland, OR 97232

Subject: Transmission System Vegetation Management Draft EIS  
SCH# 99084004

Dear Stacy Mason:

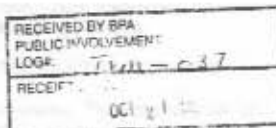
The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period closed on October 1, 1999, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the eight-digit State Clearinghouse number when contacting this office.

Sincerely,

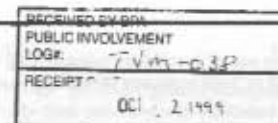
*Terry Roberts*

Terry Roberts  
Senior Planner, State Clearinghouse



## Kuehn, Virginia (Ginny) -KCC-7

From: Mason, Stacy L - KECP  
Sent: Friday, October 22, 1999 11:44 AM  
To: Kuehn, Virginia (Ginny) -KCC-7  
Subject: FW: BPA right of way EIS



Ginny -  
Another comment for the Transmission System Vegetation Management Program EIS comment log.  
stacy

-----Original Message-----  
From: Hiebert\_Paul\_A/r1\_ipnf@sv2wo [mailto:Hiebert\_Paul\_A/r1\_ipnf@sv2wo]

Sent: None  
To: balen/r1@sv2wo; Anderson\_Scot\_U/r1\_ipnf@sv2wo;  
Mousseaux\_Mark\_R/r1\_ipnf@sv2wo; Bain\_George\_M/r1\_ipnf@sv2wo  
Subject: BPA right of way EIS

bruce, i supervise the noxious weeds program on the south zone (st.joe) of the ipnf. mark mousseaux told me that you are the one gathering input for the BPA EIS. it seems to me that there should be some shared responsibility for noxious weeds control in not only the right of way but also the roads that access the towers. portions of roads within the forest service road system. i am sure, are maintained and left open and maintained solely because of the need for access to the towers. it seems to me that there should be a shared responsibility for weed control on these roads. just some thoughts for your input to the EIS



United States  
Department of  
Agriculture

Forest  
Service

Washington  
Office

14th & Independence SW  
P. O. Box 96090  
Washington, DC 20096-6090

File Code: 2720

Date:	OCT 22 1999
RECEIVED BY:	IVM-039
RECEIPT DATE:	NOV 10 1999

Bonneville Power Administration  
Communications Office - KC - 7  
P.O. Box 12999  
Portland, Oregon 97208

RE: USDA-Forest Service Comments to DOE/EIS-0285; Draft Environmental Impact Statement (DEIS), Transmission System Vegetative Management Program

With this correspondence, the Forest Service is submitting additional, programmatic comments in response to our review of the above referenced document, dated August, 1999. Additional comments have previously been provided submitted by the Forest Supervisors of the Flathead and Kootenai National Forests in Montana, in a letter from the Forest Supervisors of those Forests, dated October 5, 1999. The following are intended to be supplementary to those "Forest - specific" concerns.

#### CHAPTER I - PURPOSE AND NEED

Page 3: Reasons for the EIS: Your document states that:

*"Preparation of this document is intended to fulfill the requirements of the National Environmental Policy Act (NEPA) for Bonneville"*

What does this mean? What specific NEPA requirements is this EIS intending to fulfill (if any)? The Forest Service does not believe that this programmatic analysis is adequate to account for the environmental effects of site specific vegetative management activities along every mile of Bonneville's transmission facilities on National Forest System lands. Statements like that quoted above have the potential of implying otherwise. This statement should be clarified to more appropriately state something to the effect that:

"This document discloses the estimated environmental effects of a variety of vegetative management methods that may be considered and applied at Bonneville facilities. Decisions for treatment methods will be made in accordance with existing and/or future site-specific vegetative management plans".

Page 4: Efficiency and Consistency: Your document states:

*"Site-specific analysis would be in the form of a Supplemental Analysis"*

Recommend you add to this statement the following:

"Supplemental, site-specific analyses will be documented, and appropriate decision documents written, in accordance with the policies and procedures for the implementation of NEPA of the



BPA's Programmatic Vegetative Management Plan (DEIS)

2

agency having land management jurisdiction on the affected area, and in accordance with all other applicable State and federal laws and regulations".

Pages 18-19: Forest Service and Bureau of Land Management Documents/Projects:

Please add to the listing of documents provided the following:

**Forest Land and Resource Management Plans** - The plans provide for the allocation of National Forest System (NFS) lands and resources for a variety of management purposes. They include management direction, objectives, prescriptions, standards and guidelines, etc. applicable to each National Forest, and to designated management areas within each Forest. Pursuant to the National Forest Management Act of 1976, all site specific (or "project level") management activities must be consistent with the direction in each applicable land and resource management plan.

**Other Forest Service Land or Resource Management Plans** - Management direction, prescriptions, and guidelines in other management plans, such as Wild and Scenic River Management Plans, may also have applicability in the consideration of vegetative treatment methods used in developing site specific vegetation management plans.

Although this document lists Forest Land and Resource Management Plans as Guidance Documents in Appendix F, we believe that such Plans are of such importance in guiding management activities on NFS lands, that they should also be listed in this part of the document.

#### CHAPTER III - SITE-SPECIFIC PLANNING STEPS

Page 58: USFS-Managed Lands: Recommend revising the fifth bullet statement under this heading to read as follows:

*"If expecting the USFS to require environmental data collection for evaluation, allow more than one year for completion, and be prepared to reimburse the USFS for its cost to collect and analyze data, conduct the environmental analysis, document that analysis, and/or the cost to contract for such activities"*

Page 58: USFS-Managed Lands: Recommend revising the seventh bullet statement under this heading to read as follows:

*"Comment and engage in all Forest Service proposals to revise or amend Forest Land and Resource Management Plans, to assure that the designation and management of utility corridors are adequately addressed wherever appropriate."*

Page 58: Recommend that BPA also consider including, either in the selected alternative itself, or in the Record of Decision, specific direction that will require BPA's Project Managers to review all

EXISTING site-specific vegetative management plans, for consistency with the selected alternative of this programmatic analysis, and to revise or amend those existing plans as necessary to make them consistent with the findings, standards, guides, management direction, etc. in the selected alternative/Record of Decision of this EIS.

#### COMMENTS TO APPENDIX "F": USFS MITIGATION MEASURES AND BACKGROUND

Page F-1: The reference on that page to BLM (middle of page) is inaccurate. The sentence should be revised to read:

"These mitigation measures were developed based on current USFS Land and Resource Management planning documents."

Page F-1: Fourth Paragraph under "Mitigation Measures Specific to the USFS": Revise the paragraph to read:

"These mitigation measures will be used in reviewing, updating (as necessary) and developing site-specific vegetative management plans for BPA's facilities located on National Forest System lands. Additional measures may be used to adequately mitigate site specific environmental effects or concerns".

Page F-2: Second Bullet: Revise to read:

"Proposals for herbicide use will be subject to the review, and either concurrence or approval, by an authorized Forest Officer".

Page F-6, F-7: Recommend that the definitions of "Standards and Guidelines" be moved from Page F-7 and more appropriately be placed in front of all of the planning documents listed on these two pages, just in prior to the list beginning with "Forest Plans". Standards and guidelines are common terms used in nearly all land and resource management planning documents. Placing the definitions of these terms as written makes it appear that they (the definitions) are applicable only to their use in the Interior Columbia River Basin Draft EIS's/Appendices.

Page F-15: Third Bullet:

We can't emphasize enough the importance of this bullet statement with respect to vegetative management activities on National Forest System lands. The statement: "Site specific analysis is needed for all projects" appears here under the "Wildlife and Fish" section of these Mitigation Measures. However, this is a statement that should more appropriately be stated elsewhere in Appendix F, to make it direction applicable to ALL of the BPA's vegetative management activities on NFS lands. We recommend that at the very beginning of Appendix F, language be included which states the following:

"Site-specific vegetative management plans, developed in accordance with the standards and guides of this programmatic EIS, should be developed by Program Managers in advance of

implementing vegetative management activities on NFS lands. Existing vegetative management plans should be reviewed and revised, if necessary, to make them consistent with the Record of Decision and selected alternative of this EIS".

#### GENERAL COMMENTS --- RECOMMENDATIONS/CONSIDERATIONS FOR REALIZING THE FULL POTENTIAL BENEFIT OF THIS PROGRAMMATIC PLANNING EFFORT

The Forest Service sincerely appreciates the BPA's efforts to reach out, solicit the concerns of the Forest Service, and to address those concerns in this programmatic analysis. We believe that most of the Forest Service's concerns, previously provided to the BPA in the course of this analysis, have been adequately disclosed and addressed in this DEIS. Our agency's concerns can be more fully addressed with revisions to the document, as identified in this correspondence (above) and in additional comments that have been submitted by individual National Forests.

In more general terms, however, and as reflected in these most recent comments, the Forest Service has consistently represented to the BPA that a product of this programmatic analysis, and its Final EIS/Record of Decision, will NOT be Forest Service approval for the BPA to begin the implementation of vegetative treatment methods along its rights-of-way on National Forest System lands. We believe that existing, revised, and/or new site-specific vegetative management plans are needed as the basis for vegetative treatment activities on any segment of BPA's authorized use and occupancy on NFS land. Such plans need to be developed and adopted for use in accordance with the provisions of NEPA, and pursuant to the provisions of the outcome of this EIS/ROD.

As you have disclosed in this document, the programmatic approach that you are undertaking will serve to identify the environmental effects of various treatment methods. Its primary benefit will be its availability as a source of reference in the development of site specific management plans. In tying to the environmental effects of various treatment methods, as disclosed and documented in this analysis, the need to repeatedly (and potentially, inconsistently) cite those effects in individual site-specific plans will be precluded.

However, with your adoption of this programmatic plan, there will be a potential opportunity created to more fully realize its benefits with respect to vegetative management activities on NFS lands. That can happen if the BPA is willing to consider a comprehensive revision to the manner in which its facilities on NFS lands are now authorized. Currently, BPA's generation and transmission facilities are authorized on NFS lands under a wide variety of old, and in some cases, obsolete, forms of authorizations. They include unique Land Use Grant Instruments ("LUGI's") (that were created specifically for the BPA), Memorandums of Understanding, and various forms of our more standardized special use permits. There is little to no consistency in the terms and conditions between these different types of authorizations. Some include requirements which suggest that the Forest Service is responsible for the development of vegetative management plans (for review and approval by the BPA); a concept that is totally contrary to our management of special uses. Others have little to no reference to vegetative management activities whatsoever. In such cases, BPA has suggested that vegetative management is part of the all-inclusive concept of authorized "maintenance" of the facilities, as provided in the authorization.

## BPA's Programmatic Vegetative Management Plan (DEIS)

5

We recommend that upon the adoption of this programmatic plan, the BPA enter into discussions with the Forest Service to consider the potential of replacing all of these existing Forest Service authorizations with current special use authorizations for its facilities on NFS lands. Those discussions should address the feasibility of replacing all of BPA's existing authorizations with long-term, transferrable easements that:

- a) Are minimal in number (perhaps no more than one easement per National Forest on which BPA's facilities are located, or maybe no more than one easement per Forest Service administrative Region;
- b) Have standard terms and conditions, including standardized provisions for operation and maintenance of authorized facilities;
- c) Include a standardized format for operation and maintenance plans; AND
- d) Tier to the BPA's Record of Decision/Final EIS for its Programmatic Vegetative Management Plan, provide for an Authorized Forest Officer's to simply "concur" with site-specific vegetative management plans (rather than "approve" them), when such plans are developed consistent with and tiered to the provisions of the programmatic plan.
- e) Will provide the BPA with a long term assurance of tenure, and a transferrable interest in the NFS lands being used and occupied.

We believe that this approach has the potential to benefit both of our agencies, and provides the opportunity for your agency to realize a significant increase in the value of the programmatic vegetative management plan you are now working towards adopting. I encourage you to pursue the feasibility of this approach with Randy Karstaedt, our Special Uses Program Leader here in this office, at 202-205-1256.

Sincerely,

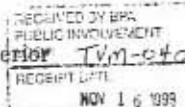
  
for JACK L. CRAVEN  
Director of Lands



IN REPLY REFER TO:

## United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
200 N.E. Multnomah Street, Suite 304  
Portland, Oregon 97232-2034



November 10, 1999

ER 99/0750

Bonneville Power Administration  
Communications Office  
P.O. Box 12999  
Portland, Oregon 97212

The Department of the Interior (Department), has reviewed the Draft Environmental Impact Statement (DEIS) for the Transmission System Vegetation Management Program, Idaho, California, Montana, Utah, Wyoming, Oregon and Washington. The following comments are provided for your use and information when preparing the Final Environmental Impact Statement (FEIS).

## GENERAL COMMENTS

In general, the Department supports the integrated approach which uses manual, mechanical, biological, and chemical methods to control vegetation on Bonneville Power Administration's (BPA) electric facilities, namely rights-of-way, electric yards, and non-electric facilities. In addition to previously utilized chemical control agents for the program, the current document now proposes the use of a total of 24 herbicidal compounds singly and in combination. While we applaud the document for not suggesting solely the use of toxic herbicides, the Department has concerns over the effects that several of the herbicides may have on non-target species, particularly endangered, threatened, and proposed species. The Fish and Wildlife Service (Service) has provided a list of such species for western Washington appears at the end of this comments section. Other Service offices can provide endangered species lists for their geographic areas. Prior to the site specific use of chemical control methods via spot, localized, broadcast and especially aerial applications, we urge BPA to work closely with the Service's field offices to minimize effects to non-target species.

The document refers to herbicides simply in terms of 'active ingredient'. Several of the compounds listed in the program have different formulations such as glyphosate and triclopyr. The different formulations contain different amounts of active ingredient, different inert compounds, and different adjuvants all of which determine the fate and effects in the environment, thus making it difficult to assess the potential toxicity to our trust resources.

Also, several of the herbicides selected for the program are very persistent in soil. An example of this is isoxaben, which has a soil half life of 5 to 6 months. Since the document states that herbicide application in electric fields may occur as often as once a year, the Department would

advise BPA to assess if chemical control is needed every year, and if so, to select compounds that are less persistent reducing the potential for accumulation and residual levels of these chemicals in the soil.

We also suggest the use of secondary containment of chemicals during transportation and storage to reduce the risk of a spill. Due to the potential for additive and synergistic interactions between chemical compounds, the use of two chemicals as a mixture should be used sparingly and with great caution in order to minimize environmental repercussions. It is imperative when formulating your tiered project specific planning steps to take into consideration the comments listed above.

Please be advised that several of the land owners involved in the program, including the U.S. Forest Service (USFS), restrict the types of chemical agents that are allowed to be used on their lands. Typically only five herbicides are approved for use on Washington State USFS land. These compounds are 2,4-D, dicamba, glyphosate, picloram, and triclopyr. Coordination between land owners and BPA should take place during the planning steps and prior to herbicide application to ensure the interests of all parties are addressed.

The program allows for the approval of new techniques and new herbicides that are not presently listed by name in the document. We have reservations about the approval process, which allows BPA to determine the environmental impacts of newly registered compounds using EPA risk assessment data without contacting the Service. Threatened and endangered species may have different considerations than risk assessment models assume and may be more sensitive to particular compounds than the organisms tested during the registration process. Thus, we urge BPA to contact and involve the Service if they contemplate adding any new herbicide to the program. Finally, in our opinion the use of a newly registered herbicide would require BPA to consult with the Service regarding effects to threatened and endangered species.

The Department does not object, in a programmatic sense, to BPA's preferred alternatives. However, the DEIS does not provide sufficient implementation detail, mitigation commitments, or alternative analysis to determine site specific impacts. Specifically, we would like to have the same mitigation measures listed for electric fields also apply to rights-of-way, non-electric fields, and noxious weed control. We recommend that site specific plans be completed for this work or that the information lacking be included in some other format. We would like to be involved in the future review of this program if BPA decides to significantly change the described preferred alternatives or follows through on our recommendation to produce site specific plans for the program in our region. We applaud BPA's effort to integrate environmentally preferred alternatives into the program and encourage the implementation of any habitat enhancing measures for fish and wildlife that can be undertaken as part of the program (i.e., allow for the growth and establishment of low growing vegetation, leave debris and brush piles in place to provide habitat, and top trees while leaving the stumps in place).

#### SPECIFIC COMMENTS

##### Herbicide mitigation measures

Under Planning Step 1 (Identify Facility and the Vegetation Management Needs), herbicide mitigation measures are specified only for electric yards. We recommend that the same mitigation measures also be specified in this planning step for rights-of-way, non-electric facilities, and noxious weed control throughout the BPA service territory. Specifically, these mitigation measures include rotating herbicide use to prevent resistance, avoiding spray drift, determining if water bodies require monitoring for herbicide contamination, and observing riparian buffer and herbicide-free zones defined on page 62 of the DEIS.

##### Herbicides and herbicide formulations

In Planning Step 2 (Identify Surrounding Land Use and Landowners/Managers), project managers are instructed to review site-specific vegetation management plans for consistency with both U.S. Forest Service (USFS) and U.S. Bureau of Land Management (BLM) mitigation measures, which are specified in Appendices F (USFS) and G (BLM) of the DEIS. Appendix F lists eight herbicide active ingredients that are approved for use by both USFS and BPA.

Experience with USFS vegetation control in Oregon and discussions with USFS personnel indicate that only four herbicide active ingredients (glyphosate, picloram, dicamba, and 2,4-D) may be used in Oregon for any type of vegetation control on USFS lands. These herbicide restrictions result from the Mediated Agreement between the Northwest Coalition for Alternatives to Pesticides, the Secretary of Agriculture, and Oregonians for Food and Shelter (May 24, 1983). Similarly, Appendix G lists 20 active ingredients or combinations that are approved for use in vegetation control by both BLM and BPA.

A footnote to this list indicates that throughout all of Oregon, herbicides may only be used for noxious weed control. Experience with BLM vegetation control in Oregon and discussions with BLM personnel confirms that throughout all of Oregon herbicides may only be used for noxious weed control. Only four active ingredients (glyphosate, picloram, dicamba, and 2,4-D) or combinations (2,4-D plus glyphosate, picloram, or dicamba) may be used in Oregon on BLM lands. While these latter restrictions are stated on page G-2 of the DEIS, other comments by BPA about eastern Oregon restrictions are misleading. We recommend that project leaders carefully review these herbicide restrictions with USFS and BLM personnel as part of Planning Step 2, and that the Final Environmental Impact Statement reflect USFS and BLM policies more accurately.

Under Planning Step 3 (Identify Natural Resources), general riparian buffer and herbicide-free zones are presented as mitigation measures to reduce potential contamination of water resources. As discussed in Chapter VI of the DEIS, the physical properties of herbicides partly determine environmental fate. In addition, different formulated products of the same active ingredient often have different environmental fates and effects (e.g., Roundup and Rodeo formulations of glyphosate, Garlon 3A and 4 formulations of triclopyr). The DEIS does not specify which formulated herbicide products will be used in vegetation management, so the Service cannot comment on potential adverse effects. However, since there are differences in environmental fate among herbicides, the use of generic riparian buffer and herbicide-free zones for all herbicide applications is not justified.



We recommend that site-specific planning include a detailed examination of the environmental fate and effects of proposed formulated herbicide products such that more restrictive riparian buffer and herbicide-free zones may be used when necessary to protect natural resources, particularly endangered and threatened species, other wildlife, fish and aquatic organisms, and water.

As part of Planning Step 4 (Determine Vegetation Control Methods), specific weather restrictions are presented as one mitigation measure to reduce herbicide drift and leaching. However, as described in Chapter IV, geology and soil types also are important in determining if herbicides will migrate to water resources. We recommend that climate, geology, and soil types be included in Planning Step 4 as factors to consider in selecting vegetation control methods.

Chapter IV also discusses toxicity as one factor that determines if an herbicide will cause adverse effects to fish or other aquatic resources. In addition, differential toxicity among herbicides is described and BPA states that using less toxic herbicides "in the vicinity of fish-bearing lakes or ponds would reduce the potential for adverse effects." The Service agrees with this assessment, however we recommend that evaluation of the toxicity of formulated herbicide products (not active ingredients) be included in site-specific planning, perhaps under Planning Step 4.

#### Endangered Species

Because of time constraints in reviewing the DEIS, we are unable to comment specifically on potential impacts to endangered and threatened species. The Service agrees that the procedures outlined under Planning Step 3 will permit project managers to comply with the provisions of the Endangered Species Act, as amended. However, we recommend that BPA consider, for the sake of efficiency, a programmatic consultation at the appropriate level (e.g., state, watershed, or species). We also recommend that any such programmatic consultation address potential project impacts to all species proposed for listing, regardless of whether BPA reaches the statutory conference threshold of being likely to jeopardize such proposed species. Chapter II of the DEIS describes the process whereby BPA may approve of new techniques if they are judged more effective or more "environmentally benign." The Service points out that new techniques may result in new effects to listed species not previously considered in consultation and therefore may trigger reinitiation of consultation.

**Canada Lynx** - Due to the recent proposal to list the Canada lynx (*Lynx canadensis*) as threatened and potential impacts to lynx from the proposed vegetation management program, it is appropriate to provide comments specific to this species. In addition to being proposed for listing, the Canada lynx is a USFS sensitive species, a Northwest Forest Plan "survey and manage" species (in Oregon and Washington), and is listed as a threatened species by the State of Washington. The proposed BPA vegetation management activities would potentially impact Canada lynx throughout their range.

The abundance of snowshoe hares significantly influences lynx populations (Parker et al. 1983, Brittell et al. 1989, Koehler and Brittell 1990, Koehler and Aubry 1994). Prime snowshoe hare habitat includes dense coniferous and deciduous thickets approaching 14,000 stems or boughs per acre. These conditions are often found beneath BPA transmission lines at higher elevations. To

be available for snowshoe hare during the winter months, forage cover must be 6 to 8 feet tall where average snow depth does not exceed 3 to 4 feet (Brocke 1975, Wolff 1980, Litvaitis et al. 1985, Monthey 1986, Brittell et al. 1989, Koehler 1990). Some hardwoods, particularly willow, are also used by snowshoe hares during the winter months (Conroy et al. 1979, Brittell et al. 1989, Koehler 1990, Koehler and Brittell 1990).

Providing adequate winter forage for snowshoe hares is a key component of maintaining or expanding snowshoe hare and Canada lynx populations. The habitat beneath transmission lines provides lynx forage cover if it consists of at least 4,700 stems or boughs per acre (1,210 trees per acre, 8 feet tall, with 6-foot spacing). This height and spacing provides adequate snowshoe hare forage and cover during average winter snow depths. The BPA management approach of promoting "low-growing plant communities" in rights-of-way using herbicides or other vegetation control methods is incompatible with management for hare and lynx. Impacts to lynx would be minimized by maintaining dense thickets of coniferous/deciduous vegetation of adequate height.

#### Listed species: Washington Cascades Only

The western portion of the Cascade Mountains in the State of Washington are associated with federally listed and proposed threatened and endangered species under the Endangered Species Act (ESA). Of the species that may be impacted by the program, the bald eagle, the spotted owl, the marbled murrelet, and bull trout are of particular concern.

Not only are direct, indirect, and cumulative effects of concern, but secondary poisoning is also an issue that will need to be addressed when considering the use of chemical control methods around habitats that contain higher trophic level organisms. Temporal issues are also of concern. The time of year chemical control agents are used is critical and should not coincide with such activities as bald eagle and marbled murrelet nesting as well as bull trout spawning and incubation.

Also, any application around water bodies should be done with the utmost care, especially when using products such as benefin, pendimethalin and trifluralin which are highly toxic to numerous aquatic species. We would advise the maximization of buffer and herbicide-free zones when applying all compounds but especially when highly toxic compounds would be applied around water. Also, low level aerial applications of herbicides may cause disturbances to threatened and endangered species.

Due to the aforementioned concerns, information provided in the proposed integrated approach, especially the chemical control methods, may have adverse impacts and may have effects on listed species. Finally, the document states that formal consultation is not needed for species previously consulted on, such as the marbled murrelet. It is our opinion that this program constitutes a new action and as such, if effects are likely to be expected from this new action, consultation on all currently listed species must be conducted.

We hope these comments are both constructive and helpful in completing the final Transmission System Vegetation Management Program - Environmental Impact Statement. We appreciate the opportunity to review and provide comments on this matter.

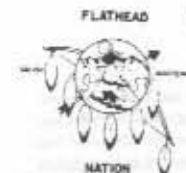
Sincerely,



Preston A. Sleeper  
Regional Environmental Officer

#### Literature Cited for Canada Lynx

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- Parker, G. R., J. W. Maxwell, L. D. Morton, and G. E. J. Smith 1983. The ecology of the lynx (*Lynx canadensis*) on Cape Breton Island. Can. Zool. 61: 770-786.
- Wolff, J. O. 1980. The role of habitat patchiness in the population dynamics of snowshoe hares. Ecol. Monogr. 50(1): 111-130.



### THE CONFEDERATED SALISH AND KOOTENAI TRIBES OF THE FLATHEAD NATION

P.O. Box 278  
Pablo, Montana 59855  
(406) 675-2700  
FAX (406) 675-2800

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DEC 14 1999

Joseph E. Dupont - Executive Secretary  
Wm L. Claborn - Executive Treasurer  
Frederick Cordier - Sergeant At-Arms

### Tribal Preservation Office

TRIBAL COUNCIL MEMBERS:  
† Michael T. Petin - Chairman  
D. Fred Malt - Vice Chairman  
Carole J. Lankford - Secretary  
Wm. Joseph Mosen - Treasurer  
Donald "Dorothy" Dupont  
Michael Duglio, Jr.  
Jeri Hamel  
Merv Letland  
Elmer "Sonny" Morjane  
Lloyd D. Irvine

December 8, 1999

Alexandra Smith  
Vice-President of Environment, Fish and Wildlife  
Bonneville Power Administration  
P.O. Box 3621  
Portland OR. 97208

Dear Ms. Smith:

Thank you for the chance to comment on the Bonneville Power Administration's Transmission System Vegetative Management Program DEIS. Our meeting with Stacy Mason of the BPA was very informative and we consider this meeting the beginning of a cooperative effort to protect cultural resources on BPA managed transmission right-of-ways. Though it is late in the comment period there are some major concerns that our Tribes feel the need to address.

First, we wish to address the apparent lack of an intensive cultural resource survey within the BPA transmission line corridors and at electrical facilities on and adjacent to the Flathead Indian Reservation. We are unable to locate any record concerning prior cultural resource survey or National Historic Preservation Act consultation with the CSKT on BPA transmission lines on or off the reservation in northwestern Montana. Lacking specific cultural resource data, it is simply impossible to assess proposed vegetation control impacts on cultural resources, or ongoing impacts to cultural sites from other transmission line management activities.

Secondly, for the CSKT, cultural resources include traditionally used cultural plant communities and plant harvest and processing areas as well as archaeological properties. Tribal elders have expressed their concerns in the past that chemical agents may pollute the native cultural plants they use for food, medicine and ceremony. Therefore, we believe that certain manual, biological and chemical vegetation control measures can adversely impact traditional cultural use properties and archaeological sites, and that these impacts should be taken into account under Section 106 of the National Historic Preservation Act (NHPA).

The Confederated Salish and Kootenai Tribal Preservation Office (CSKTPO) is responsible for protection of historic and prehistoric cultural resources on the Flathead Indian Reservation and also has an obligation to

protect cultural resources off the reservation within our ceded or aboriginal territories. These rights and responsibilities are clearly delineated within the 1999 revised regulation for implementing Section 106 of the NHPA. Therefore we provide the following recommendations:

- Implement a cultural resources inventory including a traditional cultural plant survey within the transmission line corridors and electrical facility sites on and adjacent to the Flathead Indian Reservation to identify cultural plant communities and other cultural resources.
- Develop a right-of-way management plan in consultation with the CSKT for power system corridors on and adjacent to the Flathead Indian Reservation.
- Employ tribal members to perform management tasks on and adjacent to the reservation.
- Use CSKT tribal vegetative guidelines on and adjacent to the Flathead Indian Reservation.
- Define a consultation protocol with the CSKTPO for potential impacts to cultural resources on and off reservation.

We look forward to an opportunity to meet with you or your staff soon to discuss these recommendations. We believe that it is critical to continue consultation with Joanne Bigcrane, CSK Tribal Ethnobotanist concerning native plant revegetation and the posting of chemically treated plants in plant harvesting areas. Our staff is also prepared to undertake the cultural resource studies recommended above in conjunction with the Salish and Kootenai Culture Committees and the Elders Advisory boards. Please contact Tim Ryan of our staff with your ideas for a time and place to meet. You can reach him at (406) 675-2700 ext.1081

Sincerely,

*Marcia Cross*  
Marcia Cross  
Tribal Preservation Officer

CC: Stacy Mason

† In honor of the years of dedicated service to the Tribes by the late Michael T. Petin, the position of Chairman will remain vacant until January 2001, with the Vice Chairman assuming the duties as provided by the CSKT constitution.





## The Klamath Tribes

P.O. Box 436  
Chiloquin, Oregon 97624  
Telephone (541) 783-2219  
Fax (541) 783-2029  
800-524-9787

January 4, 2000

PROJECT: BPA TRANSMISSION  
LOG#: TVM-42  
RECEIVED DATE: JAN 18 2000

Stacy Mason  
Communications Office - KC-7  
P.O. Box 12999  
Portland, OR 97208

RE: BPA Transmission System Vegetation Management Plan DEIS

Dear Stacy:

This letter is to reiterate and clarify previously communicated concerns and recommendations of the Klamath Tribes on the Draft EIS for the BPA Transmission System Vegetation Management Plan. The Klamath Tribes' Natural Resource Department has reviewed the DEIS. The DEIS was also discussed with the Klamath Tribes' Culture and Heritage Department Director. Following are comments and recommendations.

It is important to ensure that proper consultation occurs with potentially affected tribes during NEPA planning of site-specific vegetation management projects. Though chapter three ("Site Specific Planning Steps") includes text pertaining to tribal consultation, it is recommended that this section be revised to more clearly describe the need for tribal consultation.

Maps of the general area of concern to the Klamath Tribes are enclosed for reference and, and if appropriate, inclusion into the Final EIS. Additional pertinent information on the history of the Klamath Tribes is also included.

The enclosed maps depict the area recognized by the U.S. Government as the homeland of the Klamath, Modoc, and Yahooskin Band of Snake Indians during negotiation of the Treaty of 1864 (CEDED LANDS). (Note: Until recently, because of language within the treaty, the three tribes were referred to collectively as the Klamath Tribe. In recognition of the fact that tribal membership consists of members from three distinct



tribes, the name was changed to the Klamath Tribes through a recent tribal governmental action.) In terms of cultural resource protection and management, the homeland of the three tribes is often referred to as "The Klamath Tribes' Area of Cultural Influence". Physical and historical evidence indicates that the Klamath Tribes used this area historically. Because artifacts attributable to the Klamath Tribes have also been discovered outside the area depicted on the maps, it is recognized that the maps describe only the Tribes' general area of concern. In addition, it is important to note that this area was not used exclusively by the Klamath, Modoc, and Yahooskin Band of Snake Indians, and that historical use by other tribes and bands overlap in some areas.

Though the Klamath Tribes were "terminated" from federal recognition as an Indian tribe in 1954 (see enclosed literature), the Tribes' rights to hunt, fish, trap and gather, free of state and federal regulation, survived "termination". The Tribes currently exercise these rights within the former reservation boundary. In addition, there are locations outside of the 1954 Treaty Boundary within the Tribes' area of concern where tribal members continue to gather traditional plants, roots, berries, etc., and where other cultural, religious, and spiritual activities are practiced.

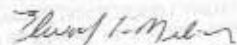
Because of potential impacts to fish, wildlife, and their habitats, plants and other resources pertinent to the exercise of treaty rights, it is imperative that the Tribes be consulted during consideration and planning of site-specific vegetation management projects within and adjacent to the former reservation boundary area. It is important to note that because of the migratory nature of fish and wildlife species relied upon by the Tribes, management concerns often extend beyond the former reservation boundary. Because of potential impacts to cultural resources, and cultural, religious, hunting, fishing, gathering and other Treaty uses, the Klamath Tribes request to be informed of all site-specific projects that will be considered or planned within The Klamath Tribes' Area of Cultural Influence. Where appropriate, the Tribes may wish to participate in development of site-specific mitigation measures to ensure protection of cultural resources and cultural/religious uses and values important to the Tribes.

Contact with the Klamath Tribes should occur early in the scoping or planning phase for site specific projects. It will be helpful to send copies of scoping letters or other notification of intent for site-specific projects (one copy or set of copies each) to the Klamath Tribal Chairman, Natural Resource Department Director, and to the Culture and Heritage Department Director.

Due to staff illness and absence during the holiday season, the Klamath Tribes' Natural Resource Department was not able to document the Tribes' comments as agreed in your previous communication with Don Gentry, the Klamath Tribes' Natural Resource Specialist. I apologize for any inconvenience this may cause. Don informed me, however, that the substance of these comments was communicated in earlier communication with you, and that this letter is a follow-up to that communication.

Thank you for the opportunity to comment on the Draft EIS. If you have questions, need additional information or clarification, or wish to discuss this issue further, please feel free to contact Don Gentry here at the Klamath Tribes Natural Resource Department.

Sincerely,



Elwood Miller, Jr.  
Natural Resource Department Director

C: Allen Foreman, Klamath Tribal Chairman  
Dino Herrera, Culture and Heritage Department Director

Enclosures: 5

# VII

## Public Comments and Responses

### 5 Enclosures:

The History of Klamath Treaty Hunting, Fishing, and Gathering Rights brochure  
The Klamath Tribe, Welcome Everyone pamphlet  
The Klamath and Modoc Tribes and The Yohoskin Band of Snake Indians Under the treaty of 10/14/1864 map  
Small Washington, Oregon, California, Nevada and Idaho colored map  
Large Washington, Oregon, California, Nevada and Idaho colored map